

Attention:

R.R. Donnelley & Sons Company  
Attn: Mark Swisher  
6821 E County Road 1100N  
Mattoon, IL 61938-3478

State of Illinois

# CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Source:

R.R. Donnelley & Sons Company  
6821 E County Road 1100N  
Mattoon, IL 61938-3478

I.D. No.: 029803AAA  
Permit No.: 95090095

Permitting Authority:

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
217/785-1705

**CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT**

Type of Application: Renewal

Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 029803AAA

Permit No.: 95090095

Statement of Basis No.: 95090095-1405

Date Application Received: September 13, 2006

Date Issued: July 22, 2014

Expiration Date: July 22, 2019

Renewal Submittal Date: 9 Months Prior to July 22, 2019

Source Name: R.R. Donnelley & Sons Company

Address: 6821 E County Road 1100N

City: Mattoon

County: Coles

ZIP Code: 61938-3478

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact Justin Cameron at 217/785-1705.

Raymond E. Pilapil  
Manager, Permit Section  
Division of Air Pollution Control

REP:MTR:JTC:jws

cc: IEPA, Permit Section  
IEPA, FOS, Region 3  
Lotus Notes Database

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## Section 1 - Source Information

## 1. Addresses

Source

R.R. Donnelley & Sons Company  
6821 E County Road 1100N  
Mattoon, IL 61938-3478

Owner

R.R. Donnelley & Sons Company  
111 South Wacker Drive  
Chicago, IL 60606-4301

Operator

R.R. Donnelley & Sons Company  
6821 E County Road 1100N  
Mattoon, IL 61938-3478

Permittee

The Owner or Operator of the source as  
identified in this table.

## 2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	<i>Name</i>	<i>Title</i>
<i>Responsible Official</i>	Mark Swisher	Vice President, Manufacturing
<i>Delegated Authority</i>	No other individuals have been authorized by the IEPA.	N/A

Other Contacts

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	Vicki Allen	217-258-2798	vicki.j.allen@rrd.com
<i>Technical Contact</i>	Vicki Allen	217-258-2798	vicki.j.allen@rrd.com
<i>Correspondence</i>	Vicki Allen	217-258-2798	vicki.j.allen@rrd.com
<i>Billing</i>	Vicki Allen	217-258-2798	vicki.j.allen@rrd.com

## 3. Single Source

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

<i>I.D. No.</i>	<i>Permit No.</i>	<i>Single Source Name and Address</i>
N/A	N/A	N/A

## Section 2 - General Permit Requirements

### 1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

### 2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
  - i. An emergency occurred and the source can identify the cause(s) of the emergency.
  - ii. The source was at the time being properly operated.
  - iii. The source submitted notice of the emergency to the IEPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
  - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

### **3. General Provisions**

#### **a. Duty to Comply**

The source must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

#### **b. Need to Halt or Reduce Activity is not a Defense**

It shall not be a defense for the source in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

#### **c. Duty to Maintain Equipment**

The source shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements. [Section 39.5(7)(a) of the Act]

#### **d. Disposal Operations**

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under. [Section 39.5(7)(a) of the Act]

#### **e. Duty to Pay Fees**

- i. The source must pay fees to the IEPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

#### **f. Obligation to Allow IEPA Surveillance**

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
  - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
  - B. As otherwise authorized by the Act.
- v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

**g. Effect of Permit**

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:
  - A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.
  - B. The liability of the Owner or Operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.
  - C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.
  - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

**h. Severability Clause**

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

<b>4. <u>Testing</u></b>
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- a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of

any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
  - i. **Testing by Owner or Operator:** The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
  - ii. **Testing by the IEPA:** The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

## **5. Recordkeeping**

### **a. Control Equipment Maintenance Records**

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates maintenance was performed and the nature of preventative maintenance activities.

### **b. Retention of Records**

- i. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7)(e)(ii) of the Act]
- ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

### **c. Availability of Records**

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of



requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

## 6. Certification

### a. Compliance Certification

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:
  - A. The identification of each term or condition of this permit that is the basis of the certification.
  - B. The compliance status.
  - C. Whether compliance was continuous or intermittent.
  - D. The method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

### b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

## 7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the IEPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit. This permit shield does not extend to applicable requirements which are promulgated after June 5, 2014 (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

## 8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR."
  - i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
  - ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN."
  - i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
  - ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

## 9. Reopening and Revising Permit

### a. Permit Actions

R.R. Donnelley & Sons Company  
 I.D. No.: 029803AAA  
 Permit No.: 95090095

Date Received: 9/13/2006  
 Date Issued: 7/22/2014

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

**b. Reopening and Revision**

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

**c. Inaccurate Application**

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

**d. Duty to Provide Information**

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

**10. Emissions Trading Programs**

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

**11. Permit Renewal**

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(l) and (o) of the Act]
- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

**12. Permanent Shutdown**

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

**13. Startup, Shutdown, and Malfunction**

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

## Section 3 - Source Requirements

### 1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

#### a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.
- ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

#### b. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), the Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.
- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

#### c. Asbestos Demolition and Renovation

- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or

demolish pursuant to Condition 3.1(c)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.

- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

**d. NESHAP Standards (40 CFR 63 Subpart DDDDD)**

Pursuant to 40 CFR 63.7495(b), no later than January 31, 2016, the source must:

- i. Meet the applicable general provisions of 40 CFR 63 Subpart A. See Condition 7.3 (c).
- ii. Have a one-time energy assessment performed on the source as specified in 40 CFR 63 Subpart DDDDD Table 3 Condition 3, pursuant to 40 CFR 63.7500(a)(1).

**e. Future Emission Standards**

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

**2. Applicable Plans and Programs**

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

**a. Fugitive PM Operating Program**

Should this source become subject to 35 IAC 212.302, the Permittee shall prepare and operate under a Fugitive PM Operating Program consistent with 35 IAC 212.310 and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). Any future Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the Fugitive PM Operating Program is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Fugitive PM Operating Program. In the event that the IEPA notifies the Permittee of a deficiency with any Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

**b. PM<sub>10</sub> Contingency Measure Plan**

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM<sub>10</sub> Contingency Measure Plan reflecting the PM<sub>10</sub> emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM<sub>10</sub> Contingency Measure Plan.

**c. Episode Action Plan**

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.
- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.
- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on November 19, 2012, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO<sub>2</sub>, PM<sub>10</sub>, NO<sub>2</sub>, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.
- v. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

**d. Risk Management Plan (RMP)**

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

**3. Title I Requirements**

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this Condition.

**4. Synthetic Minor Limits**

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

## 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
  - I. Requirements in Conditions 3.1(a)(i), 3.1(b), 3.1(c), 3.1(d), and 3.1(e).
  - II. Requirements in Conditions 3.2(c).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

### b. Semiannual Reporting

- i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.
 

<u>Monitoring Period</u>	<u>Report Due Date</u>
January through June	July 31
July through December	January 31
- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

### c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report to the Air Quality Planning Section, due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.



## Section 4 - Emission Unit Requirements

### 4.1 Heatset, Web Offset Lithographic Printing Lines

#### 1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Offset Press MM-715 with Natural Gas-Fired Dryer	VOM, PM, and SO <sub>2</sub>	1981	N/A	Tandem Regenerative Thermal Oxidizer (RTO) System	Continuous Temperature Monitor
Offset Press MM-716 with Natural Gas-Fired Dryer	VOM, PM, and SO <sub>2</sub>	1981	N/A	Tandem Regenerative Thermal Oxidizer (RTO) System	Continuous Temperature Monitor
Offset Press MM-717 with Natural Gas-Fired Dryer	VOM, PM, and SO <sub>2</sub>	1981	N/A	Tandem Regenerative Thermal Oxidizer (RTO) System	Continuous Temperature Monitor
Offset Press MM-718 with Natural Gas-Fired Dryer	VOM, PM, and SO <sub>2</sub>	2005	N/A	Tandem Regenerative Thermal Oxidizer (RTO) System	Continuous Temperature Monitor
Offset Press MM-719 with Natural Gas-Fired Dryer	VOM, PM, and SO <sub>2</sub>	1996	N/A	Tandem Regenerative Thermal Oxidizer (RTO) System	Continuous Temperature Monitor
Offset Press MM-721 with Natural Gas-Fired Dryer	VOM, PM, and SO <sub>2</sub>	2000	N/A	Tandem Regenerative Thermal Oxidizer (RTO) System	Continuous Temperature Monitor
Offset Press MM-722 with Natural Gas-Fired Dryer	VOM, PM, and SO <sub>2</sub>	2003	N/A	Tandem Regenerative Thermal Oxidizer (RTO) System	Continuous Temperature Monitor
Offset Press MM-723 with Natural Gas-Fired Dryer	VOM, PM, and SO <sub>2</sub>	1993	N/A	Tandem Regenerative Thermal Oxidizer (RTO) System	Continuous Temperature Monitor

#### 2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

##### a. i. Opacity Requirements

- A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

##### ii. Compliance Method (Opacity Requirements)

###### Monitoring

- A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations on each individual stack associated with each press and dryer or common stack (e.g., the RTO exhaust stack) in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the press, maintenance and repair and/ or adjustment of operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.

###### Recordkeeping

R.R. Donnelley & Sons Company  
I.D. No.: 029803AAA  
Permit No.: 95090095

Date Received: 9/13/2006  
Date Issued: 7/22/2014

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

**b. i. Particulate Matter Requirements (PM)**

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Condition 7.2(a))

**ii. Compliance Method (PM Requirements)**

Recordkeeping

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:
  - I. The hours of operation for each printing line, hr/mo and hr/yr.
  - II. The emissions of PM from each printing line, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the hourly limits of 35 IAC 212.321.

**c. i. Sulfur Dioxide Requirements (SO<sub>2</sub>)**

- A. Pursuant to 35 IAC 214.301, for the dryers and RTO, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

**ii. Compliance Method (SO<sub>2</sub> Requirements)**

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records, which demonstrate that the natural gas quality is equal to pipeline quality natural gas, as required by Condition 4.1.2(e). These records may be supplied by the fuel supplier/vendor.

**d. i. Volatile Organic Material Requirements (VOM)**

- A. Pursuant to the following permits, VOM emissions from the presses shall not exceed the following limits: [T1]

**Section 4 - Emission Unit Requirements**  
**4.1 - Heatset, Web Offset Lithographic Printing Lines**

Lithographic Press No.	VOM Emissions		Permit No.
	Ton/Mo	Ton/Yr	
715	3.5	27.6	01040001
716	3.6	28.5	90090032
717	4.56	36.55	97120012
718	4.72	28.30	04090076
719	4.2	36.7	96040078
721	6.28	37.67	99070077
722	1.78	10.7	03020041
723	3.9	30.9	93010015

ii. Compliance Method (VOM Requirements)

Testing

- A. Testing to determine the VOM destruction efficiency is required by Condition 4.1.2(e) (ii) (B).

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records:
- I. Pounds of VOM per gallon or weight percent of VOM for inks, coatings, fountain solution additives, cleaning solvents, and any other VOM-containing materials used (lb/gallon or %VOM by weight).
  - II. Quantity of inks, coatings, fountain solution additives, cleaning solvents and any other VOM-containing materials used (gallons or pounds/mo and gallons or pounds/yr);
  - III. VOM content of "as-applied" fountain solutions (in percent, by weight, of VOM) used on each printing line.
  - IV. Results of VOM content testing for VOM containing waste, if applicable.
  - V. The emissions of VOM from each printing line, tons/mo and ton/yr (12 month rolling average), with supporting calculations.
- C. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the printing lines (the presses and the dryers) are subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.4 and Table 7.4.1, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Owner or Operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

e. i. Operational and Production Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, when natural gas is used as a fuel, pipeline quality natural gas shall be the only fuel fired in the dryers and the RTOs.
- B. Pursuant to Construction Permit #01070002 and Permit #95090095, The RTOs shall be operated to reduce VOM emissions by 97% (i.e., system will operate at a destruction efficiency of at least 97%). [T1]
- C. Pursuant to Section 39.5(7)(a) of the Act, the RTOs cross over chamber shall be preheated to at least 1,404°F, which is the temperature at which

compliance was demonstrated in the most recent compliance test, before the printing process is begun, and this temperature shall be maintained during operation of the presses. If the total air flow from all operating presses does not require both RTOs, one of them may be shut down or kept in a hot standby mode.

ii. Compliance Method (Operational and Production Requirements)

Monitoring

- A. Pursuant to 39.5(7)(a) of the Act, each RTO shall be equipped with a continuous monitoring device which is installed, calibrated, operated and maintained according to vendor specifications or other good operating practices at all times the RTO is in use. The monitoring device shall monitor the temperature of the RTO.
  - I. If the continuous recorder is not operating (e.g., being repaired), the Permittee shall record the temperature information every four hours until the continuous recording device is returned to service.

Testing

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall perform the following testing:
  - I. At least once every 5 years, the Permittee shall conduct emissions testing for the thermal oxidizer system, at his own expense.
  - II. Any tests of volatile organic material emissions, including tests conducted to determine control device destruction efficiency, shall be conducted in accordance with the methods and procedures specified in 35 IAC 215.102.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the following:
  - I. Any period during which a continuous recorder is not operating, the temperature information for the RTO every four hours during such event, and an explanation of the steps that were taken to ensure the continuous recorder was put back into operation expeditiously as possible.
  - II. Results of the emission testing required by Condition 4.1.2(e)(ii)(B) that demonstrate compliance with 97% reduction of VOM emissions, as required by Condition 4.1.2(e)(i)(B).
  - III. The temperature of the combustion chamber associated with the RTO system.
- D. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the RTOs associated with the printing lines are subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.4 and Table 7.4.1, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Owner or Operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

**f. i. Work Practice Requirements**

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate each press, dryer, and associated auxiliary equipment in accordance with manufacture's specifications and in a manner consistent with safety and good air pollution control practice for minimizing emissions.
- B. Pursuant to Section 39.5(7)(a) of the Act, for the presses, which use control equipment, the air pressure in the dryer is maintained lower than the air pressure of the press room and all of the exhaust is ducted to the RTO system.

**ii. Compliance Method (Work Practice Requirements)**

**Recordkeeping**

- A. Pursuant to Sections 39.5(7)(a) of the Act, the Permittee shall maintain records of the occurrence and duration of each malfunction of operation (i.e., process equipment), air pollution control equipment, or monitoring equipment.
- B. Pursuant to Sections 39.5(7)(a) of the Act, the Permittee shall maintain records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

<b>3. Non-Applicability Determinations</b>
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- a. The printing lines are not subject to the New Source Performance Standards (NSPS) for Subpart QQ—Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR Part 60 Subpart QQ, because the presses are not publication rotogravure printing presses.
- b. The printing lines are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts A , KK and OOOO , because the presses are not publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses, and do not coat or print fabric or other textiles.
- c. The printing lines are not subject to 35 IAC 215.301 because the printing lines are controlled by RTOs that provide greater than 85% control, pursuant to 35 IAC 215.302.

<b>4. Other Requirements</b>
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For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

**a. Operational Flexibility Requirements**

- i. Pursuant to Permit #95090095, the Permittee is authorized to make the following physical or operational change with respect to a lithographic press without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:
  - A. Upgrades of process equipment including drives and electrical components, provided that the press web speed does not exceed the design speed specified in the most recent permit application and such upgrades will not increase emissions above the limits of this permit.

- B. Installation and operation of automated cleaning solvent application devices.
- C. Use of UV coatings.
- D. Use of water-based coatings containing less than 0.10 lb VOM per gallon of coating.
- ii. Notwithstanding Condition 4.1.2(f)(i)(B) and Condition 4.1.2(e)(i)(B) the Permittee is allowed to operate the presses without oxidizer control or with the oxidizer temperature below that specified in Condition 4.1.2(e)(i)(C) if the emissions from the individual presses meet the requirements of Condition 4.1.2(d)(i) and no other permit emissions limitations (e.g., monthly limits) or requirements will be violated. Emissions from operation under these conditions shall be based on a 0% VOM destruction efficiency.
- iii. If the Permittee operates the presses without RTO control or with the RTO temperature below that specified in Condition 4.1.2(e)(i)(C), the Permittee shall maintain a record of the dates and times of such occurrences with supporting calculations to demonstrate that the requirements of Condition 4.1.2(d)(i) and no other permit emissions limitations (e.g., monthly limits) or requirements were violated.

## **5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

### **a. Prompt Reporting**

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), 4.1.2(c)(i), 4.1.2(d)(i), 4.1.2(e)(i), and 4.1.2(f)(i).
  - II. Requirements in Conditions 4.1.4(a)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

**4.2 Rotogravure Printing Presses and Storage Tanks (Subject to NESHAP KK and Noted  
(\*) Units are also Subject to NSPS QQ)**

**1. Emission Units and Operations**

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Gravure Press MR-728	VOM and HAP	1980	N/A	Carbon Absorber Solvent Recovery System	Inlet and Outlet Continuous Emission Monitors
Gravure Press MR-729	VOM and HAP	1980	N/A	Carbon Absorber Solvent Recovery System	Inlet and Outlet Continuous Emission Monitors
Gravure Press MR-730	VOM and HAP	1972	N/A	Carbon Absorber Solvent Recovery System	Inlet and Outlet Continuous Emission Monitors
Gravure Press MR-735*	VOM and HAP	2005	N/A	Carbon Absorber Solvent Recovery System and Permanent Total Enclosure	Inlet and Outlet Continuous Emission Monitors
Gravure Press MR-736*	VOM and HAP	2001	N/A	Carbon Absorber Solvent Recovery System and Permanent Total Enclosure	Inlet and Outlet Continuous Emission Monitors
Gravure Press MR-737*	VOM and HAP	1981	N/A	Carbon Absorber Solvent Recovery System	Inlet and Outlet Continuous Emission Monitors
Gravure Press MR-738*	VOM and HAP	1981	N/A	Carbon Absorber Solvent Recovery System	Inlet and Outlet Continuous Emission Monitors
Gravure Tank TF-1, 10,000 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None
Gravure Tank TF-2, 10,000 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None
Gravure Tank TF-3, 8,000 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None
Gravure Tank TF-4, 8,000 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None
Gravure Tank TF-5, 10,000 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None
Gravure Tank TF-6, 8,000 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None
Gravure Tank TF-7, 8,000 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None
Gravure Tank TF-8, 8,000 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None
Gravure Tank TF-9, 10,000 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None
Gravure Tank TF-10, 8,000 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None
Gravure Tank TF-11, 8,000 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None
Gravure Tank TF-12, 8,000 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None

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Permit No.: 95090095

Date Received: 9/13/2006  
Date Issued: 7/22/2014

**Section 4 - Emission Unit Requirements**

**4.2 - Rotogravure Printing Presses and Storage Tanks (Subject to 40 CFR 63 Subpart KK)**

Gravure Tank TF-13, 25,000 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None
Gravure Tank TF-14, 25,000 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None
Gravure Tank TF-15, 650 Gallon	VOM and HAP	1972	N/A	Submerged Loading Pipe	None
Gravure Tank TF-16, 8,000 Gallon	VOM and HAP	1999	N/A	Submerged Loading Pipe	None

\* These units are also subject to the requirements of 40 CFR 60 Subpart QQ.

## **2. Applicable Requirements**

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

### **a. i. Opacity Requirements**

- A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

#### **ii. Compliance Method (Opacity Requirements)**

##### **Monitoring**

- A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each individual stack associated with each press or a common stack in accordance with Method 22 for visible emissions at least once every three years. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the press, maintenance and repair and/ or adjustment of operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.

##### **Recordkeeping**

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

### **b. i. Particulate Matter Requirements (PM)**

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Condition 7.2(a))



ii. Compliance Method (PM Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:

I. The hours of operation for each press, hr/mo and hr/yr.

II. The emissions of PM from each press, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the hourly limits of 35 IAC 212.321.

c. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 40 CFR 60.432, for Presses MR-735, MR-736, MR-737, and MR-738, no owner or operator shall cause to be discharged into the atmosphere from any affected facility VOC equal to more than 16 percent of the total mass of VOC solvent and water used at that facility during any one performance averaging period (i.e., 84% recovery).

B. Pursuant to Construction Permit #01070002, VOM emissions from MR-736 shall not exceed 9.85 Ton/Mo and 78.8 Ton/Yr. [T1]

C. Pursuant to Construction Permit #04090076, VOM emissions from MR-735 shall not exceed 9.85 Ton/Mo and 78.74 Ton/Yr. [T1]

D. Pursuant to Permit #81080017, VOM emissions from MR-737 and MR-738, combined, shall not exceed 1,585.2 Ton/Yr. [T1]

E. Pursuant to 35 IAC 215.122(b), for the Gravure Tanks (TF-1 through TF-16), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device.

ii. Compliance Method (VOM Requirements)

Monitoring

A. Pursuant to 40 CFR 60.433(g)(2), if all existing and affected facilities located within the same plant boundary use solvent-borne ink systems with solvent recovery systems, the Permittee may show compliance on a plantwide basis for all the existing and affected facilities together. No separate emission tests on existing facilities and no temporary segregated liquid measurement procedures for affected facilities are required for this option. The plantwide performance may be determined by the Permittee on a direct mass basis according to the following method:

I. Pursuant to 40 CFR 60.433(c)(1), if an affected facility controlled by a solvent recovery system uses only solvent-borne ink systems, the Permittee may determine compliance on a direct mass basis. On a direct mass basis, compliance is determined according to 40 CFR 60.433(b).

B. Pursuant to 40 CFR 60.433(b), compliance shall be determined by the procedures listed in 40 CFR 60.433(b)(1-5) and by using the equation provided by 40 CFR 60.433(b)(6) to determine the average VOC emission percentage for the affected facility.

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- C. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform annual inspections of the Gravure Tanks and their associated auxiliary equipment. During the inspections, the Permittee shall ensure the presence of submerged loading pipes in the tanks that are in working condition.

Testing

- D. Pursuant to 40 CFR 60.433(a), the Permittee shall conduct performance tests in accordance with 40 CFR 60.8, under the following conditions:
- I. The performance averaging period for each test is 30 consecutive calendar days and not an average of three separate runs as prescribed under 40 CFR 60.8(f).
  - II. For the purpose of measuring bulk storage tank (Tank are addressed in Section 4.4.) quantities of each color of raw ink and each related coating used, the Permittee shall install, calibrate, maintain, and continuously operate during the test, the following:
    - 1) Storage tanks to serve more than one facility with the liquid quantities used determined by measuring devices other than press meters, if facilities are combined as described by 40 CFR 60.433(g) and Condition 4.2.2(c)(ii)(A), above.
  - III. Printing press startups and shutdowns are not included in the exemption provisions under 40 CFR 60.8(c). Frequent periods of press startups and shutdowns are normal operations and constitute representative conditions for the purpose of a performance test.
- E. The Permittee shall perform all applicable testing in accordance with the specifications of 40 CFR 60.435(a), 40 CFR 60.435(b), and 40 CFR 60.435(e).

Recordkeeping

- F. Pursuant to 40 CFR 60.433(a)(5), the Permittee shall maintain records of the measured amounts used at the affected facility and the liquid temperature at which the amounts were measured are maintained for each shipment of all purchased material on at least a weekly basis for:
- I. The raw inks and related coatings used;
  - II. The VOC content of each raw ink and related coating used as determined according to 40 CFR 60.435;
  - III. The VOC solvent added to the inks used;
  - IV. The VOC solvent used as a cleaning agent; and
  - V. The VOC solvent recovered.
- G. Pursuant to Section 39.5(7)(b) of the Act, records of the following deviations shall be separately maintained:
- I. Instances of VOM control efficiency lower than that specified in Condition 4.2.2(c)(i)(A) as established by procedures in 40 CFR 60.434.
- H. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain specific records showing the adsorption efficiency (%) of the carbon absorption system on at least a monthly basis.

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- I. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records, with supporting calculations:
  - I. The VOM emissions from Rotogravure Press MR-735 and Rotogravure Press MR-736, Ton/Mo and Ton/Yr; and
  - II. The VOM emissions from Rotogravure Presses MR-737 and MR-738, combined, Ton/Yr.
- J. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each Gravure Tank inspection performed. These records shall include, at a minimum, the following:
  - I. Date and time inspections were performed;
  - II. Name(s) of inspection personnel;
  - III. Identification of equipment being inspected; and
  - IV. Findings of the inspections, noting the presence of the submerged loading pipe.

**d. i. Hazardous Air Pollutant Requirements (HAP)**

- A. Pursuant to 40 CFR 63.820(a)(1), the source is subject to the following applicable requirements of 40 CFR 63 Subpart KK because the source operates new and existing publication rotogravure presses at a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2. Pursuant to 40 CFR 63.821(a)(1), the requirements of 40 CFR 63 Subpart KK apply to the presses and all affiliated equipment, including any proof presses, cylinder and parts cleaners (addressed in Section 4.3), ink and solvent mixing and storage equipment, and solvent recovery equipment.
  - I. Pursuant to 40 CFR 63.824(a) and 40 CFR 63.824(b)(1), the Permittee shall limit emissions of organic HAP to no more than eight percent of the total volatile matter used each month. The emission limitation may be achieved by overall control of at least 92 percent of organic HAP used, by substitution of non-HAP materials for organic HAP, or by a combination of capture and control technologies and substitution of materials.

**ii. Compliance Method (HAP Requirements)**

**Monitoring/Testing**

- A. Pursuant to 40 CFR 63.824(b)(1)(i), for all emission units in Condition 4.2.1 except MR-735 and MR-736, the Permittee shall demonstrate compliance by showing that the HAP emission limitation is achieved by performing a liquid-liquid material balance for each month as follows:
  - I. Measure the mass of each ink, coating, varnish, adhesive, primer, solvent, and other material used by the affected source during the month.
  - II. Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent and other material used by the affected source during the month following the procedure in 40 CFR 63.827(b)(1).

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- III. Determine the volatile matter content, including water, of each ink, coating, varnish, adhesive, primer, solvent, and other material used by the affected source during the month following the procedure in 40 CFR 63.827(c)(1).
- IV. Install, calibrate, maintain and operate, according to the manufacturer's specifications, a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The device shall be initially certified by the manufacturer to be accurate to within  $\pm 2.0$  percent.
- V. Measure the amount of volatile matter recovered for the month.
- VI. Calculate the overall effective organic HAP control efficiency ( $R_e$ ) for the month using the following equation:

$$R_e = (100) \frac{M_{vu} - M_{ku} + [(M_v)(M_{ku} / M_{vu})]}{M_{vu}} \quad Eq 1$$

For the purposes of this calculation, the mass fraction of organic HAP present in the recovered volatile matter is assumed to be equal to the mass fraction of organic HAP present in the volatile matter used.

- VII. The affected source is in compliance for the month, if  $R_e$  is at least 92 percent each month.

Note: The affected source for purpose of this requirement includes the gravure presses and all affiliated equipment, including any proof presses, cylinder and parts cleaners (covered in Section 4.3), ink and solvent mixing and storage equipment, and solvent recovery equipment.

- B. Pursuant to 40 CFR 63.824(b)(1)(i), for Presses MR-735 and MR-736, the Permittee shall demonstrate compliance by showing that the HAP emission limitation is achieved by use of continuous emission monitors and by continuously monitoring the site specific operating parameter, which was established during the initial performance tests for the presses, to assure capture efficiency as follows:
  - I. Install continuous emission monitors to collect the data necessary to calculate the total organic volatile matter mass flow in the gas stream entering and the total organic volatile matter mass flow in the gas stream exiting the solvent recovery device for each month such that the percent control efficiency (E) of the solvent recovery device can be calculated for the month. This requires continuous emission monitoring of the total organic volatile matter concentration in the gas stream entering the solvent recovery device, the total organic volatile matter concentration in the gas stream exiting the solvent recovery device, and the volumetric gas flow rate through the solvent recovery device. A single continuous volumetric gas flow measurement should be sufficient for a solvent recovery device since the inlet and outlet volumetric gas flow rates for a solvent recovery device are essentially equal. Each month's individual inlet concentration values and corresponding individual gas flow rate values are multiplied and then summed to get the total organic volatile matter mass flow in the gas stream entering the solvent recovery device for the month. Each month's individual outlet concentration values and corresponding individual gas flow rate values are multiplied and then summed to get the total organic

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volatile matter mass flow in the gas stream exiting the solvent recovery device for the month.

- II. Determine the percent capture efficiency (F) of the capture system according to 40 CFR 63.827(e)(1).
- III. Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent and other material used by the affected source during the month following the procedure in 40 CFR 63.827(b)(1).
- IV. Determine the volatile matter content, including water, of each ink, coating, varnish, adhesive, primer, solvent, and other material used by the affected source during the month following the procedure in 40 CFR 63.827(c)(1).
- V. Calculate the overall effective organic HAP control efficiency ( $R_e$ ) achieved for each month using the following equation:
 
$$R_e = (100) \frac{M_{vu} - M_{ku} + [(E/100)(F/100)M_{ku}]}{M_{vu}} \quad Eq\ 2$$
- VI. Install, calibrate, operate and maintain the instrumentation necessary to measure continuously the site-specific operating parameter established in accordance with 40 CFR 63.828(a)(5).
- VII. The affected source is in compliance with the requirement for the month if  $R_e$  is at least 92 percent, and the capture device is operated at an average value greater than, or less than (as appropriate) the operating parameter value established in accordance with 40 CFR 63.828(a)(5) for each three-hour period.

Recordkeeping

- C. Pursuant to 40 CFR 63.829(b), the Permittee shall maintain the following records on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1):
  - I. Records specified in 40 CFR 63.10(b)(2), of all measurements needed to demonstrate compliance with this standard, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.
  - II. Records specified in 40 CFR 63.10(b)(3) for each applicability determination performed by the Permittee in accordance with the requirements of 40 CFR 63.820(a), and
  - III. Records specified in 40 CFR 63.10(c) for each continuous monitoring system operated by the Permittee in accordance with the requirements of 40 CFR 63.828(a).
- D. Pursuant to 40 CFR 63.829(c), the Permittee shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.824. The records shall be maintained in accordance with the requirements of 40 CFR 63.10(b).

e. i. **Operational and Production Requirements**

- A. Pursuant to Construction Permits #01070002 and #04090076, for Presses MR-736 and MR-735, respectively:
- I. Presses MR-736 and MR-735 shall be equipped with Permanent Total Enclosures (PTEs) that insure 100% capture of the VOM from the inks and solvents used on the printing units. [T1]
- II. VOM emissions from the presses and the associated PTEs shall be controlled by an activated carbon solvent recovery system that achieves a minimum 98% VOM removal efficiency across the carbon beds based on a monthly average. [T1]

ii. **Compliance Method (Operational and Production Requirements)**

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, to ensure 100% capture of VOM from the inks and solvents used on the printing units, once per week, the Permittee shall demonstrate that negative pressure is maintained in the PTEs when Press MR-736 and/or MR-735 are in operation by performing to following:
- I. Check that all openings of the PTEs are minimized.
- II. Ensure that any ventilation system(s) (e.g., fans) needed to maintain negative pressures within the PTEs are operating.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following record:
- I. A log demonstrating that the inspections required ensuring that 100% capture of VOM from the inks and solvents used on the printing units were performed as required by Condition 4.2.4(e)(ii)(A).
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records which demonstrate that a 98% removal efficiency across the carbon beds, based on a monthly average, is maintained in accordance with Condition 4.2.2(e)(i)(A)(II).

f. i. **Work Practice Requirements**

- A. Pursuant to 40 CFR 63.823(b), the Permittee must at all times operate and maintain the emission units listed in Condition 4.2.1, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

ii. **Compliance Method (Work Practice Requirements)**

Recordkeeping

- A. Pursuant to 40 CFR 63.829(g), the Permittee shall maintain records of the occurrence and duration of each malfunction of operation ( i.e., process equipment), air pollution control equipment, or monitoring equipment.

- B. Pursuant to 40 CFR 63.829(h), the Permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.823(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

### **3. Non-Applicability Determinations**

- a. Presses MR-728, MR-729, and MR-730 are not subject to the New Source Performance Standards (NSPS) for Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR Part 60 Subpart QQ, because these presses were not constructed, modified, or reconstructed after October 28, 1980.
- b. The Gravure Presses are not subject to 35 IAC 215.301 because the Gravure Presses are controlled by a carbon bed absorber solvent recovery system that provides greater than 85% control, pursuant to 35 IAC 215.302.
- c. Pursuant to 35 IAC 215.204(c), the Gravure Presses are not subject to 35 IAC 215.204(c), Coating Operations/Paper Coating, as the paper coating limitation does not apply to equipment used for both printing and paper coating.
- d. The Gravure Tanks are not subject to the requirements of 35 IAC 215.301 because the tanks do not use an organic material in a manner that would subject them to this standard.
- e. The emission units listed in Condition 4.2.1 are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because these emission units are all subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).

### **4. Other Requirements**

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

#### **a. Start-up, Shutdown, and Malfunction Breakdown Requirements**

##### **i. Federal Requirements**

- A. Pursuant to 40 CFR 63.6(e)(3), the Permittee is required to have a written Startup, Shutdown and Malfunction (SSM) Plan for the affected rotogravure presses.
  - I. The SSM Plan at the site and any revision to that plan is hereby incorporated by reference and is enforceable as a term and condition of this permit.
  - II. Revisions to the SSM Plan are automatically incorporated by reference and do not require a permit revision.

#### **b. Operational Flexibility Requirements**

- i. Pursuant to Permit #95090095, the Permittee is authorized to make the following physical or operational change with respect to a Rotogravure Press without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:
  - A. Upgrades of process equipment including drives and electrical components, provided that the press web speed does not exceed the design speed specified

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in the most recent permit application and such upgrades will not increase emissions above the limits of this permit.

- B. Installation of fume capture (scavengers) devices and enclosures.
- C. Use of low VOM or water based inks or cleaning solvents.
- D. Use of printing related materials with less than 16% VOM content shall be permitted without directing dryer exhaust to the carbon adsorption solvent recovery system provided that monthly and annual VOM emissions comply with Conditions 4.2.2(d) (i) (E-H).
- E. Use of UV or water-based coatings containing less than 0.10 lb VOM/gal, unless annual emissions exceed 4.4 ton/yr.

<b>5. Reporting Requirements</b>
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The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

**a. Prompt Reporting**

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c)(i), 4.2.2(d)(i), 4.2.2(e)(i), and 4.2.2(f)(i).
  - II. Requirements in Conditions 4.2.4(a)(i) and 4.2.4(b)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

**b. Federal Reporting**

- i. Pursuant to 40 CFR 63.830(b)(2), the Permittee shall submit the following reports:
  - A. A notification of Performance Tests specified in 40 CFR 63.7 and 63.9(e). This notification, and the site-specific test plan required under 40 CFR 63.7(c)(2) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or



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unless comments received from the Administrator require monitoring of an alternate parameter.

- B. A Notification of Compliance Status specified in 40 CFR 63.9(h).
- C. Performance test reports specified in 40 CFR 63.10(d)(2).
- D. A summary report specified in 40 CFR 63.10(e)(3) shall be submitted on a semi-annual basis (i.e., once every 6-month period). These summary reports are required even if the affected source does not have any control devices or does not take the performance of any control devices into account in demonstrating compliance with the emission limitations in 40 CFR 63.824. In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i), the summary report shall include, exceedances of the standard in 40 CFR 63.824.

### 4.3 Rotogravure Cylinder Manufacturing (Subject to 40 CFR 63 Subpart KK)

#### 1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Cylinder De-chrome Tank	PM, VOM, and HAP	1987	N/A	In-line Demist Filter	None
Cylinder Washer	PM, VOM, and HAP	1997	N/A	Carbon Absorber Solvent Recovery System	Inlet and Outlet Continuous Emission Monitors
Preparation Station (Stripping)	PM, VOM, and HAP	1981	N/A	None	None
Two Preparation Tanks	PM, VOM, and HAP	1981	N/A	None	None
Finishing Sinks	PM, VOM, and HAP	1981	N/A	None	None
Renzeman	PM, VOM, and HAP	1981	N/A	None	None
Deionized Water Tank	PM, VOM, and HAP	1981	N/A	None	None

#### 2. Applicable Requirements

For the emission units in Condition 4.3.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

##### a. i. Opacity Requirements

- A. Pursuant to 35 IAC 212.123, no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

##### ii. Compliance Method (Opacity Requirements)

###### Monitoring

- A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each individual stack or a common stack in accordance with Method 22 for visible emissions at least once every three years. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the tank, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

###### Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any

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corrective action taken including if the corrective action took place within 4 hours of the observation.

- C. Pursuant to Section 39.5(7)(b) of the Act, if required, the Permittee shall keep records for all opacity measurements made in accordance with Method 9.

**b. i. Particulate Matter Requirements (PM)**

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Condition 7.2(a))

**ii. Compliance Method (PM Requirements)**

**Recordkeeping**

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:
- I. The hours of operation for each emission unit listed in Condition 4.3.1, hr/mo and hr/yr.
- II. The emissions of PM from each emission unit listed in Condition 4.3.1, ton/mo and ton/yr (12 month rolling average), with supporting calculations.

**c. i. Volatile Organic Material Requirements (VOM)**

- A. I. Pursuant to 35 IAC 215.301, for all emission units except the Cylinder Washer, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 IAC 215.302, 215.303, 215.304 and with the following exception: If no odor nuisance exists the above limitation shall apply only to photochemically reactive material.
- II. Pursuant to 35 IAC 215.302(b), for the Cylinder Washer, emissions of organic material in excess of those permitted 35 IAC 215.301, above, are allowable if such emissions are controlled by a vapor recovery system which adsorbs and/or condenses at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere.

Note: The Cylinder Washer is a controlled emission unit. It is vented to the same carbon absorption system as the Rotogravure Printing Presses.

- B. Pursuant to Permit #81080014, emissions of organic materials from the roto cylinder manufacturing shall not exceed 36.0 T/Yr. [T1]

**ii. Compliance Method (VOM Requirements)**

**Monitoring**

- A. See section 4.2 for sufficient monitoring of the carbon absorption system, which controls the Cylinder Washer.

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Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain specific records showing the adsorption efficiency (%) of the carbon absorption system on at least a monthly basis.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records:
  - I. The VOM content (%) of all materials used for all equipment listed in Condition 4.3.1, except for the Cylinder Washer.
  - II. Usage of each VOM containing material used for all equipment listed in Condition 4.3.1, except for the Cylinder Washer.
  - III. The emissions of VOM from all equipment listed in Condition 4.3.1, except for the Cylinder Washer, tons/mo and ton/yr (12 month rolling average), with supporting calculations.
- J. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain a record of the VOM emissions from the roto cylinder manufacturing, ton/yr, with supporting calculations:

**d. i. Hazardous Air Pollutant Requirements (HAP) - 40 CFR 63 Subpart KK**

- A. Pursuant to 40 CFR 63.820(a)(1), the source is subject to the following applicable requirements of 40 CFR 63 Subpart KK because the source operates new and existing publication rotogravure presses (covered in Section 4.2) at a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2. The requirements of 40 CFR 63 Subpart KK apply to the presses (covered in Section 4.2) and all affiliated equipment, including any proof presses, cylinder and parts cleaners, ink and solvent mixing and storage equipment (covered in Section 4.2), and solvent recovery equipment.
  - I. Pursuant to 40 CFR 63.824(a) and 40 CFR 63.824(b)(1), the Permittee shall limit emissions of organic HAP to no more than eight percent of the total volatile matter used each month. The emission limitation may be achieved by overall control of at least 92 percent of organic HAP used, by substitution of non-HAP materials for organic HAP, or by a combination of capture and control technologies and substitution of materials.

**ii. Compliance Method (HAP Requirements)**

Monitoring/Testing

- A. Pursuant to 40 CFR 63.824(b)(1)(i), the Permittee shall demonstrate compliance by showing that the HAP emission limitation is achieved by performing a liquid-liquid material balance for each month as specified in Condition 4.2.2(e)(ii)(A).

Recordkeeping

- B. Pursuant to 40 CFR 63.829(b), the Permittee shall maintain the records specified in Condition 4.2.2(e)(ii)(C) and (D).

**e. i. Operational and Production Requirements**

- A. Pursuant to 35 IAC 215.182(a), no person shall operate a cold cleaning degreaser (e.g., cylinder washer) unless:

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- I. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20 percent of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
  - II. The cover of the degreaser is closed when parts are not being handled; and
  - III. Parts are drained until dripping ceases.
- B. Pursuant to 35 IAC 215.182(b), no person shall operate a cold cleaning degreaser (e.g., cylinder washer) unless:
- I. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counterweights, or a powered system if:
    - 1) The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38° C (100° F);
    - 2) The solvent is agitated; or
    - 3) The solvent is heated above ambient room temperature;
  - II. The degreaser is equipped with a facility for draining cleaned parts. The drainage facility shall be constructed so that parts are enclosed under the cover while draining unless:
    - 1) The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38° C (100° F); or
    - 2) An internal drainage facility cannot be fitted into the cleaning system, in which case the drainage facility may be external.
  - III. The degreaser is equipped with one of the following control devices if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38 C (100 1/4 F) or if the solvent is heated above 50° C (120° F) or its boiling point:
    - 1) A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; or
    - 2) Any other equipment or system of equivalent emission control as approved by the Agency. Such a system may include a water cover, refrigerated chiller or carbon adsorber.
  - IV. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
  - V. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.
- ii. Compliance Method (Operational and Production Requirements)
- A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of each cold cleaning degreaser (e.g., cylinder washer) and associated auxiliary equipment.

Recordkeeping

R.R. Donnelley & Sons Company  
I.D. No.: 029803AAA  
Permit No.: 95090095

Date Received: 9/13/2006  
Date Issued: 7/22/2014

**Section 4 - Emission Unit Requirements**  
**4.3 - Rotogravure Cylinder Manufacturing (Subject to 40 CFR 63 Subpart KK)**

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of this inspection, which at a minimum include, the date and time inspections were performed; the name(s) of inspection personnel; identification of equipment being inspected; and the findings of the inspections.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed on the cold cleaning degreasers along with a maintenance and repair log. These records shall demonstrate compliance with each applicable regulation in Conditions 4.3.2(e)(i) (A & B) and include, at a minimum:
  - I. Date and time inspections were performed;
  - II. Name(s) of inspection personnel;
  - III. Identification of equipment being inspected;
  - IV. Findings of the inspections (e.g., degreaser is closed when parts are not being handled, etc.);
  - V. Operation and maintenance procedures; and
  - VI. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

**f. i. Work Practice Requirements**

- A. Pursuant to 40 CFR 63.823(b) and/or Section 39.5(7)(b) of the Act, the Permittee must at all times operate and maintain the emission units listed in Condition 4.3.1, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

**ii. Compliance Method (Work Practice Requirements)**

**Recordkeeping**

- A. Pursuant to 40 CFR 63.829(g) and/or Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the occurrence and duration of each malfunction of operation ( i.e., process equipment), air pollution control equipment, or monitoring equipment.
- B. Pursuant to 40 CFR 63.829(h), for the emission units subject to 40 CFR 63 Subpart KK, the Permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.823(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- C. Pursuant to Section 39.5(7)(b) of the Act, for the emission units not subject to 40 CFR 63 Subpart KK, the Permittee shall maintain records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

### **3. Non-Applicability Determinations**

- a. The emission units listed in Condition 4.3.1, which are subject to 40 CFR 63 Subpart KK, are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because these emission units are all subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).

### **4. Other Requirements**

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

### **5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

#### **a. Prompt Reporting**

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
- I. Requirements in Conditions 4.3.2(c)(i), 4.3.2(d)(i), 4.3.2(e)(i), and 4.3.2(f)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
- A. Date and time of the deviation.
- B. Emission unit(s) and/or operation involved.
- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

#### **b. Federal Reporting (for 40 CFR 63 Subpart KK)**

- i. Pursuant to 40 CFR 63.830(b)(2), the Permittee shall submit the reports specified in Condition 4.2.5(b).

#### 4.4 Hard Chrome Plating Operation (Subject to 40 CFR 63 Subpart N)

##### 1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Hard Chrome Plating Tank #2	PM and HAP	1981	N/A	Composite Mesh Pad Scrubber (CMES) with HEPA Filter and Baffle Mist Eliminator	Pressure Drop Monitor Valves
Hard Chrome Plating Tank #2	PM and HAP	1981	N/A	Composite Mesh Pad Scrubber (CMES) with HEPA Filter and Baffle Mist Eliminator	Pressure Drop Monitor Valves

##### 2. Applicable Requirements

For the emission units in Condition 4.4.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

###### a. i. Opacity Requirements

- A. Pursuant to 35 IAC 212.123, no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

###### ii. Compliance Method (Opacity Requirements)

###### Monitoring

- A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each individual stack or a common stack in accordance with Method 22 for visible emissions at least once every three years. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the tank, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

###### Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- C. Pursuant to Section 39.5(7)(b) of the Act, if required, the Permittee shall keep records for all opacity measurements made in accordance with Method 9.



b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321(a), for the hard chrome plating tanks, no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Condition 7.2(a))

ii. Compliance Method (PM Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:
- I. The hours of operation for each emission unit listed in Condition 4.4.1, hr/mo and hr/yr.
- II. The emissions of PM from each emission unit listed in Condition 4.4.1, ton/mo and ton/yr (12 month rolling average), with supporting calculations.

c. i. Hazardous Air Pollutant Requirements (HAP)

- A. Pursuant to 40 CFR 63.340, the source is subject to 40 CFR 63 Subpart N, National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, because the source performs hard chromium electroplating. The Permittee is also subject to the applicable provisions of 40 CFR 63 Subpart A. (See Condition 7.3 for Subpart A applicability)
- I. Pursuant to 40 CFR 63.342(b)(1) and 40 CFR 63.342(b)(2), the following requirements apply during tank operation, and during periods of startup and shutdown. Since the Permittee is controlling a group of tanks (e.g., both Hard Chrome Plating Tank #2 and #3) with a common add-on air pollution control device (e.g., the Composite Mesh Pad Scrubber (CMES)), the following emission limitations shall apply whenever any one affected source (e.g., either tank) is operated.
1. Pursuant to 40 CFR 63.342(c)(1), the concentration of total chromium emissions in the exhaust gas stream discharged to the atmosphere from the tanks shall not exceed 0.015 mg/dscm.
2. Pursuant to 40 CFR 63.342(g), the standard in Condition 4.3.2(d)(i)(A)(I), above, that apply to chromic acid baths shall not be met by using a reducing agent to change the form of chromium from hexavalent to trivalent.
- II. Pursuant to 40 CFR 63.342(f)(1), the Permittee is subject to the following:
1. At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices and consistent with the operation and maintenance plan required by Condition 4.3.2(d)(i)(C), below.

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**4.4 - Hard Chrome Plating Operation (Subject to 40 CFR 63 Subpart N)**

2. Malfunctions shall be corrected as soon as practicable after their occurrence.
3. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.

III. Pursuant to 40 CFR 63.342(f)(3), the Permittee shall maintain and operate the hard chrome plating tanks according to an operation and maintenance (O & M) plan. The O & M plan, submitted to the Agency on November 13, 2012, is incorporated by reference into this permit, and must contain at least the following:

1. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device, and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment;
2. The plan shall incorporate the operation and maintenance practices for the add-on control device or monitoring equipment, as identified in 40 CFR 63.342 Table 1, and as noted in Condition 4.3.2(ii)(A), below;
3. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;
4. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions; and
5. The plan shall include housekeeping procedures, as specified in 40 CFR 63.342 Table 2.

ii. Compliance Method (HAP Requirements)

Monitoring

- A. Pursuant to 40 CFR 63.342(f)(3)(i)(B) and Table 1 of 40 CFR 63.342, the Permittee shall perform the following for the composite mesh pad control system:
  - I. At least once per quarter, visually inspect device to ensure there is proper drainage, no chronic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.
  - II. At least once per quarter, visually inspect back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.
  - III. At least once per quarter, visually inspect ductwork from tank to the control device to ensure there are no leaks.
  - IV. Perform washdown of the composite mesh-pads in accordance with manufacturer's recommendations.

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**4.4 - Hard Chrome Plating Operation (Subject to 40 CFR 63 Subpart N)**

- B. Pursuant to 40 CFR 63.343(c)(1)(ii), the Permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that any tank is operated. The composite mesh-pad system shall be operated within the parameters established during the initial performance test, which are 3.8 inches of water in the water column  $\pm$  2 inches (e.g., 1.8 to 5.8 inches).
- I. Pursuant to 40 CFR 63.343(c)(1)(iv), the requirement to operate a composite mesh-pad system within the range of pressure drop values established under Condition 4.3.2(d)(ii)(B), above, does not apply during automatic washdown cycles of the composite mesh-pad system.

Recordkeeping

- C. Pursuant to 40 CFR 63.346(b), the Permittee shall maintain the following records:
- I. Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of 40 CFR 63.342(f) and Table 1 of 40 CFR 63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection;
- II. Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment, except routine housekeeping practices;
- III. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment;
- IV. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.342(a)(1), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation;
- V. Records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by 40 CFR 63.342(f)(3);
- VI. Test reports documenting results of all initial performance tests that were performed with all measurements that may be necessary to determine the conditions of these performance tests;
- VII. Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected;
- VIII. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment;
- IX. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment;

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**4.4 - Hard Chrome Plating Operation (Subject to 40 CFR 63 Subpart N)**

- X. The total process operating time of the affected source during the reporting period;
- XI. Records of the actual cumulative rectifier capacity of hard chromium electroplating tanks at a facility expended during each month of the reporting period, and the total capacity expended to date for a reporting period, if the owner or operator is using the actual cumulative rectifier capacity to determine facility size in accordance with 40 CFR 63.342(c)(2);
- XII. Copies of notifications and reports required by 40 CFR Parts 63.9, 63.10, and 63.347.

**d. i. Operational and Production Requirements**

- A. Pursuant to Construction Permit #05050083, the composite mesh pad scrubber associated with the tanks shall be operated at all times when the tanks are in operation, including periods of startup and shutdown. [T1]
- B. Pursuant to 40 CFR 63.342(c)(3)(i), to be considered a small, hard chromium electroplating facility, the maximum cumulative potential rectifier capacity for the chrome plating tanks shall not exceed 60 million amp-hr/yr, calculated as a 12 month rolling period. This limit may only be exceeded provided that within 30 days of the exceedance the Permittee intends to no longer operate as a small chromium electroplating facility, and the Agency is notified in accordance with Section 4.3.5.
- C. Pursuant to Section 39.5(7)(a) of the Act, the pressure drop across the HEPA filter shall be within the parameters established during the initial performance test, which are 1.4 inches of water in the water column  $\pm$  2 inches (e.g., 0 to 3.4 inches).

**ii. Compliance Method (Operational and Production Requirements)**

**Monitoring**

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall monitor and record the pressure drop across the HEPA Filter once each day.

**Recordkeeping**

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of this inspection, which at a minimum include, the date and time inspections were performed; the name(s) of inspection personnel; identification of equipment being inspected; and the findings of the inspections, specifically noting the composite mesh pad scrubber is in operation.
- D. Records to demonstrate compliance with Condition 4.3.2(d)(i)(B), above, are required by 40 CFR 63 Subpart N, specifically Condition 4.3.2(c)(ii)(C)(XI).
- E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the daily measurements of pressure drop across the HEPA Filter.

**e. i. Work Practice Requirements**

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee must at all times operate and maintain the emission units listed in Condition 4.3.1, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for

**Section 4 - Emission Unit Requirements**  
**4.4 - Hard Chrome Plating Operation (Subject to 40 CFR 63 Subpart N)**

minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

ii. Compliance Method (Work Practice Requirements)

Recordkeeping

- A. Pursuant to 40 CFR 63.346(b)(3)) and/or Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment.
- B. Pursuant to 40 CFR 63.829(h), for the emission units subject to 40 CFR 63 Subpart N, the Permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.342(a)(1), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

**3. Non-Applicability Determinations**

- a. Hard chrome plating tanks #2 and #3 are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for HAP emissions, because the tanks are subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).

**4. Other Requirements**

For the emission units in Condition 4.4.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Title I Requirements (Construction Permit 05050083) [T1]

- A. Pursuant to Condition 1.1.6(a) of Construction Permit 05050083, emissions of PM, SO<sub>2</sub> and VOM, individually, from the line shall not exceed 0.1 lb/hr and 0.44 Ton/yr.

ii. Compliance Method

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of emissions of PM, SO<sub>2</sub> and VOM from the line, tons/mo and ton/yr (12 month rolling average), with supporting calculations.

**5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

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**4.4 - Hard Chrome Plating Operation (Subject to 40 CFR 63 Subpart N)**

- I. Requirements in Conditions 4.3.2(b)(i), 4.3.2(c)(i), 4.3.2(d)(i), and 4.3.2(e)(i).
- II. Requirements in Condition 4.3.4(a)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

**b. Federal Reporting (40 CFR 63 Subpart N)**

- i. Pursuant to 40 CFR 63.347(g)(1), ongoing compliance status reports for major sources, the Permittee shall submit a summary report to the Administrator to document the ongoing compliance status of the source. Pursuant to 40 CFR 63.347(g)(3), the report shall contain the information required by Condition 4.3.5(b)(ii), below, and shall be submitted semiannually except when:
  - A. The Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source; or
  - B. The monitoring data collected by the Permittee of the source in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once the Permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency under 40 CFR 63.347(g)(2) is approved.
- ii. Pursuant to 40 CFR 63.347(g)(3), contents of ongoing compliance status reports, the Permittee shall prepare a summary report to document the ongoing compliance status of the source. The report must contain the following information:
  - A. The company name and address of the affected source;
  - B. An identification of the operating parameter that is monitored for compliance determination, as required by 40 CFR 63.343(c);
  - C. The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status required by 40 CFR 63.347(e);
  - D. The beginning and ending dates of the reporting period;
  - E. A description of the type of process performed in the affected source;

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- F. The total operating time of the affected source during the reporting period;
- G. If the affected source is a hard chromium electroplating tank and the owner or operator is limiting the maximum cumulative rectifier capacity in accordance with 40 CFR 63.342(c)(2), the actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis;
- H. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;
- I. A certification by a responsible official, as defined in 40 CFR 63.2, that the work practice standards in 40 CFR 63.342(f) were followed in accordance with the operation and maintenance plan for the source;
- J. If the operation and maintenance plan required by 40 CFR 63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by 40 CFR 63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed;
- K. A description of any changes in monitoring, processes, or controls since the last reporting period;
- L. The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.342(a)(1), including actions taken to correct a malfunction.
- M. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and
- N. The date of the report.

#### 4.5 Paper Handling System with Cyclones\*

##### 1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Paper Collection System No.1 (C-1)	PM	1972	N/A	None	None
Paper Collection System No.3 (C-3)	PM	1981	N/A	Baghouse No.1	None
Paper Collection System No.5 (C-5)	PM	1981	N/A	None	None
Paper Collection System No.7 (C-7)	PM	1995	N/A	None	None
Paper Collection System No.8 (C-8)	PM	1995	N/A	None	None

\*Note: The cyclones associated with the system are not considered control devices because they only act to recover product, i.e. paper.

##### 2. Applicable Requirements

For the emission units in Condition 4.5.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

###### a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

###### ii. Compliance Method (Opacity Requirements)

###### Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the baghouse exhaust associated with Paper Collection System No. 3 (C-3) or common stack in accordance with Method 22 for visible emissions at least once every operating day (in accordance with the CAM Plan - Condition 4.5.2(b)(ii)(B)). If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the scrap paper collector, maintenance and repair and/ or adjustment of operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.

B. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the Paper Collection System Nos. 1, 5, 7, and 8 (C-1, C-5, C-7, and C-8) or common stack in accordance with Method 22 for visible emissions at least once per month. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the scrap paper collector, maintenance and repair and/ or adjustment of operation. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.



Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Condition 7.2(a))
- B. Pursuant to Permit #72110351 and #95090095, the Permittee shall comply with the following limits:

Unit	PM Emissions	
	(Ton/Month)	(Ton/Year)
C-1	1.3	14.7
C-5	1.3	14.7
C-7	0.9	9.85
C-8	0.9	9.85
C-3	2.5	26.20

ii. Compliance Method (PM Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:
- I. The hours of operation for each paper collection system, hr/mo and hr/yr.
- II. Monthly and annual quantities of paper conveyed through each paper collection system, ton/mo and ton/yr.
- II. The emissions of PM from each paper collection system, ton/mo and ton/yr (12 month rolling average), with supporting calculations.
- B. For Paper Collection System No. 3 (C-3), pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the Paper Collection System (C-3) is subject to 40 CFR Part 64 for PM. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.4 and Table 7.4.2, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Owner or Operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

c. i. **Work Practice Requirements**

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate each paper collection system, including Baghouse No.1 associated with C-3, in a manner consistent with safety and good air pollution control practice for minimizing emissions.

ii. **Compliance Method (Work Practice Requirements)**

Monitoring

- A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of each paper collection system that is not subject to CAM (i.e., C-1, C-5, C-7, and C-8). The monitoring and records associated with and/or similar to the monitoring required by the CAM Plan submitted for C-3 and Baghouse No.1 is sufficient to verify compliance with Condition 4.5.2(c)(i), above.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum:
- I. Date and time inspections were performed;
  - II. Name(s) of inspection personnel;
  - III. Identification of equipment being inspected;
  - IV. Findings of the inspections;
  - V. Operation and maintenance procedures; and
  - VI. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

**3. Non-Applicability Determinations**

- a. Paper collection systems Nos. 1, 5, 7, and 8 (C-1, C-5, C-7 and C-8) are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because these paper collection systems do not use an add-on control device to achieve compliance with an emission limitation or standard.

**4. Other Requirements**

For the emission units in Condition 4.4.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. **Operational Flexibility Requirements**

- i. Pursuant to Permit #95090095, the Permittee is authorized to make the following physical or operational change with respect to a paper handling system without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:
- A. Upgrades of equipment drives and electrical components.

- B. Replacement, upgrading or relocation of bindery equipment which would dictate changes to the waste paper trim collection systems, with no increase in potential emissions of regulated pollutants.
  - C. Addition of waste paper trim collection systems designed for additional by-product paper streams, with no increase in potential emissions of regulated pollutants.
- ii. If the Permittee makes any physical or operational change with respect to a paper handling system, as noted in Condition 4.5.4(a)(i) above, the Permittee shall maintain records with any supporting calculations to verify that there was no increase in potential emissions of regulated pollutants as a result of the physical or operational change.

## 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.5.2(a)(i), 4.5.2(b)(i), and 4.5.2(c)(i).
  - II. Requirements in Condition 4.5.4(a)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

#### 4.6 Boiler (Subject to 40 CFR 60 Subpart Dc)

##### 1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Boiler No. 7 (33.5 mmBtu/hr)	PM, CO, NO <sub>x</sub> , VOM, and SO <sub>2</sub>	2001	N/A	None	None

Note: This unit is natural gas or fuel oil fired. Fuel oil is maintained as a back-up fuel only.

##### 2. Applicable Requirements

For the emission unit in Condition 4.6.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

###### a. i. Opacity Requirements

A. NSPS Standards (40 CFR 60 Subparts A and Dc):

- I. Pursuant to 40 CFR 60.1, the provisions of 40 CFR 60 Subpart A apply to the owner or operator.
  - II. Pursuant to 40 CFR 60.43c(c), no owner or operator of a boiler that combusts oil and has a heat input capacity of 30 mmBtu/hour or greater shall cause to be discharged into the atmosphere from that boiler any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.
  - III. Pursuant to 40 CFR 60.43c(d), the opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.
- B. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

###### ii. Compliance Method (Opacity Requirements)

###### Monitoring

- A. Pursuant to 40 CFR 60.47c(a), the owner or operator shall comply with either 40 CFR 60.47c(a)(1) or 40 CFR 60.47c(a)(2) below:
- I. Pursuant to 40 CFR 60.47c(a)(1), the owner or operator shall conduct Method 9 performance tests using the procedures in 40 CFR 60.47c(a) according to the applicable schedule in 40 CFR 60.47c(a)(1)(i) through (a)(1)(iv), as determined by the most recent Method 9 performance test results.
    1. If no visible emissions are observed, a subsequent Method 9 performance test must be completed within 12 calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later;
    2. If visible emissions are observed but the maximum 6-minute average opacity is less than or equal to 5 percent, a subsequent Method 9 performance test must be completed within 6

calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later;

3. If the maximum 6-minute average opacity is greater than 5 percent but less than or equal to 10 percent, a subsequent Method 9 performance test must be completed within 3 calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later; or
  4. If the maximum 6-minute average opacity is greater than 10 percent, a subsequent Method 9 performance test must be completed within 45 calendar days from the date that the most recent performance test was conducted.
- II. Pursuant to 40 CFR 60.47c(a)(2), if the maximum 6-minute opacity is less than 10 percent during the most recent Method 9 performance test, the owner or operator may, as an alternative to performing subsequent Method 9 performance tests in 40 CFR 60.47c(a)(1), elect to perform subsequent monitoring using Method 22 according to the procedures specified below:
1. The owner or operator shall conduct 10 minute observations (during normal operation) each operating day the boiler fires fuel for which an NSPS opacity standard is applicable using Method 22 and demonstrate that the sum of the occurrences of any visible emissions is not in excess of 5 percent of the observation period (i.e., 30 seconds per 10 minute period). If the sum of the occurrence of any visible emissions is greater than 30 seconds during the initial 10 minute observation, immediately conduct a 30 minute observation. If the sum of the occurrence of visible emissions is greater than 5 percent of the observation period ( i.e., 90 seconds per 30 minute period), the owner or operator shall either document and adjust the operation of the boiler and demonstrate within 24 hours that the sum of the occurrence of visible emissions is equal to or less than 5 percent during a 30 minute observation (i.e., 90 seconds) or conduct a new Method 9 performance test using the procedures in 40 CFR 60.47c(a) within 45 calendar days according to the requirements in 40 CFR 60.45c(a)(8).
  2. If no visible emissions are observed for 10 operating days during which an opacity standard is applicable, observations can be reduced to once every 7 operating days during which an opacity standard is applicable. If any visible emissions are observed, daily observations shall be resumed.

#### Recordkeeping

- B. Pursuant to 40 CFR 60.48c(c), in addition to the applicable requirements in 40 CFR 60.7, the owner or operator of a boiler subject to the opacity limits in 40 CFR 60.43c(c) shall submit excess emission reports for any excess emissions from the affected facility that occur during the reporting period and maintain records according to the requirements specified in 40 CFR 60.48c(c)(1) and (2) below, as applicable to the visible emissions monitoring method used.
- I. Pursuant to 40 CFR 60.48c(c)(1), for each performance test conducted using Method 9, the owner or operator shall keep the records including the information specified below:

1. Dates and time intervals of all opacity observation periods.
  2. Name, affiliation, and copy of current visible emission reading certification for each visible emission observer participating in the performance test.
  3. Copies of all visible emission observer opacity field data sheets.
- II. Pursuant to 40 CFR 60.48c(c)(2), for each performance test conducted using Method 22, the owner or operator shall keep the records including the information specified below:
1. Dates and time intervals of all visible emissions observation periods.
  2. Name and affiliation for each visible emission observer participating in the performance test.
  3. Copies of all visible emission observer opacity field data sheets.
  4. Documentation of any adjustments made and the time the adjustments were completed to the boiler operation by the owner or operator to demonstrate compliance with the applicable monitoring requirements.
- C. Pursuant to 40 CFR 60.48c(g)(2), the owner or operator of a boiler shall record and maintain records of the amount of each fuel combusted during each calendar month.

**b. i. Particulate Matter Requirements (PM)**

- A. Pursuant to 35 IAC 212.206, when firing distillate fuel oil, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period to exceed 0.15 kg of particulate matter per MW-hr of actual heat input from any fuel combustion emission unit using liquid fuel exclusively (0.10 lbs/mmBtu).

**ii. Compliance Method (PM Requirements)**

**Recordkeeping**

- A. Pursuant to 39.5(7)(b), the Permittee shall maintain records of PM emissions, when firing fuel oil, in the terms of the applicable standard (lbs/mmBtu) from the boiler on an hourly basis, with supporting calculations.

**c. i. Sulfur Requirements (SO<sub>2</sub>)**

- A. NSPS Standards, if firing fuel oil (40 CFR 60 Subparts A and Dc)
- I. Pursuant to 40 CFR 60.1, the provisions of 40 CFR 60 Subpart A apply to the owner or operator.
  - II. Pursuant to 40 CFR 60.42c(d), no owner or operator of a boiler that combusts oil shall combust oil in the boiler that contains greater than 0.5 weight percent sulfur.

III. Pursuant to 40 CFR 60.42c(i), the fuel oil sulfur limits apply at all times, including periods of startup, shutdown, and malfunction.

IV. Pursuant to 40 CFR 60.42c(h)(1), for distillate oil-fired boilers with heat input capacities between 10 mmBtu/hr and 100 mmBtu/hr, compliance with the fuel oil sulfur limits are determined based on a certification from the fuel supplier, as described under 40 CFR 60.48c(f).

B. Pursuant to 35 IAC 214.122(b), if fuel oil is fired, no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hr), burning liquid fuel exclusively, to exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu).

ii. Compliance Method (SO<sub>2</sub> Requirements)

Testing

A. Pursuant to 40 CFR 60.44c(h), for boilers subject to 40 CFR 60.42c(h)(1) where the owner or operator seeks to demonstrate compliance with the SO<sub>2</sub> standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, as described in 40 CFR 60.48c(f).

Recordkeeping

B. Pursuant to 40 CFR 60.48c(e) and (f), the owner or operator of each boiler subject to the fuel oil sulfur limits under 40 CFR 60.42c shall keep records and submit reports as required under 40 CFR 60.48c(d), including the following information:

- 1) Calendar dates covered in the reporting period.
- 2) Fuel supplier certification including the following information; the name of the oil supplier, a statement from the oil supplier that the oil complies with the specifications under the definition of distillate fuel oil in 40 CFR 60.41c, and the sulfur content or maximum sulfur content of the oil.
- 3) A certified statement signed by the owner or operator of the boiler that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

C. Pursuant to 40 CFR 60.48c(g)(2), the owner or operator of a boiler shall record and maintain records of the amount of each fuel combusted during each calendar month (gallons/mo).

D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the sulfur content of the distillate fuel oil (weight percent).

E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of SO<sub>2</sub> emissions from the boiler when fired with distillate fuel oil including supporting calculations (pounds/mmBtu).

d. i. Carbon Monoxide Requirements (CO)

A. Pursuant to 35 IAC 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission

source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.

ii. Compliance Method (CO Requirements)

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of CO emissions from the boiler, including supporting calculations (pounds/hour).
- B. The periodic monitoring required by the operational and production requirements in Condition 4.7.2(e) and the work practice requirement in Condition 4.7.2(f) also address monitoring required to meet 39.5(7)(f) of the Act.

e. i. Operational and Production Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, when the boiler is fired using natural gas, only pipeline quality natural gas shall be used.
- B. Pursuant to Section 39.5(7)(a) of the Act, when the boiler is fired using fuel oil, only #2 fuel oil shall be used.
- C. Pursuant to Construction Permit #01070002, the use of distillate fuel oil shall not exceed 0.24 million gallons per month and 1.92 million gallons per year. [T1]
- D. Pursuant to Construction Permit #01070002, the maximum firing rate of Boiler No. 7 shall not exceed 33.5 mmBtu/hr. [T1]

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b), the Permittee shall maintain records of the following:
  - I. The type of fuel fired in the boiler; and
  - II. The total natural gas consumption (mmscf/month or therms/month and mmscf/yr or therms/yr) for the boiler.
  - III. The total distillate fuel oil consumption (gal/month and gal/yr) for the boiler.
  - IV. Compliance with Condition 4.7.2(e)(i)(C) is assured by the records required by Condition 4.7.2(c)(ii)(C).

f. i. Work Practice Requirements

- A. Pursuant to 40 CFR 60.11(d) and Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the boiler in a manner consistent with safety and good air pollution control practice for minimizing emissions.
- B. For the purpose of 40 CFR Part 63, Subpart DDDDD, Boiler No. 7 will meet the following definition, provided by 40 CFR 63.7575, of a unit designed to burn gas 1 fuels (e.g., natural gas) and be classified as such:

*"Unit designed to burn gas 1 subcategory includes any boiler or process heater that burns only natural gas, refinery gas, and/or other gas 1 fuels. Gaseous fuel boilers and process heaters that burn liquid fuel for periodic testing of liquid fuel, maintenance, or operator training, not to exceed a*



*combined total of 48 hours during any calendar year, are included in this definition. Gaseous fuel boilers and process heaters that burn liquid fuel during periods of gas curtailment or gas supply interruptions of any duration are also included in this definition."*

- I. Pursuant to 40 CFR 63.7515(d) and 40 CFR Part 63, Subpart DDDDD, Table 3, beginning no later than January 31, 2016, the Permittee shall conduct an annual tune-up in accordance with 40 CFR 63.7540(a)(10), each annual tune-up specified in 40 CFR 63.7540(a)(10) must be no more than 13 months after the previous tune-up. This tune-up shall consist of the following:
- 1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
  - 2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
  - 3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);
  - 4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject; and
  - 5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform regular maintenance of the boiler and associated auxiliary equipment.

Recordkeeping

- B. Pursuant to 40 CFR 63.7540(a)(10)(vi), the Permittee shall maintain on-site and submit, if requested by the IEPA, an annual report containing the following information:
- I. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;

- II. A description of any corrective actions taken as a part of the tune-up; and
  - III. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.
- C. Pursuant to 40 CFR 63.7555(h), the Permittee shall maintain the following records:
- I. You must keep records of the total hours per calendar year that alternative fuel (e.g., fuel not meeting the definition of "gas 1") is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies.
- D. Pursuant to 40 CFR 63.7555(i), the Permittee shall maintain records of the calendar date, time, occurrence and duration of each startup and shutdown.
- E. Pursuant to 40 CFR 63.7555(j), the Permittee shall maintain records of the type(s) and amount(s) of fuels used during each startup and shutdown.
- F. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

### **3. Non-Applicability Determinations**

- a. The boiler is not subject to 35 IAC 212.322, because the boiler is not by definition process emission units.
- b. The boiler is not subject to 35 IAC 214.301, because the boiler is not by definition process emission units.
- c. The boiler is not subject to 35 IAC 217.141, because the boiler does not have an actual heat input equal to or greater than 250 mmBtu/hr.
- d. The boiler is not subject to the requirements of 35 IAC 218.301 and 302, Use of Organic Material, because, pursuant to 35 IAC 218.303, these regulations shall not apply to fuel combustion emission sources.
- e. The boiler is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the boiler does not use an add-on control device to achieve compliance with an emission limitation or standard.

### **4. Other Requirements**

For the emission units in Condition 4.6.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

**a. i. Title I Requirements (Construction Permit #01070002 & Permit #95090095) [T1]**

- A. Pursuant to Condition 7.5.6 of Permit # 95090095 and Condition 3.1.6(b) of Const. Permit #01070002, emissions from Boiler No. 7 shall not exceed the following limits:

<u>Pollutants</u>	<u>Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
CO	1.2	12.33
NO <sub>x</sub>	2.1	20.63
VOM	0.8	0.81
SO <sub>2</sub>	3.9	38.72

ii. Compliance Method (Construction Permit #01070002 & Permit #95090095)

Recordkeeping

- A. Pursuant to Condition 7.5.9(a)(ii) of Permit #95090095 and Condition 3.1.9(c) of Const. Permit #01070002, the Permittee shall maintain records of the emissions of NO<sub>x</sub>, CO, SO<sub>2</sub>, and VOM (tons/mo and tons/yr) for Boiler No. 7 with supporting calculations.

**b. Operational Flexibility Requirements**

- i. Pursuant to Permit #95090095, the Permittee is authorized to make the following physical or operational change with respect to an affected boiler without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:
- A. Replacement or upgrading of fuel burners without increase in heat capacity.
- B. Use of natural gas or fuel oil for fuel, as described in the permit application provided that the use of fuel oil in Boiler No. 7 does not exceed the allowable usage of Condition 4.6.2(e)(i)(D).
- C. Upgrades of equipment drives and electrical components.

ii. Compliance Method (Operational Flexibility)

If the Permittee makes any physical or operational change with respect to the boiler, as noted in Condition 4.6.4(b)(i) above, the Permittee shall maintain records with any supporting calculations to verify that there was no increase in potential emissions of regulated pollutants as a result of the physical or operational change.

**5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

**a. Prompt Reporting**

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
- I. Requirements in Conditions 4.6.2(a)(i), 4.6.2(b)(i), 4.6.2(c)(i), 4.6.2(d)(i), and 4.6.2(e)(i).
- II. Requirements in Conditions 4.6.4(a)(i) and 4.6.4(b)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

**b. Federal Reporting**

Pursuant to 40 CFR 60.48c(j), as part of the Semiannual Monitoring Reports required by Condition 3.5(b), the owner or operator shall submit the reports as identified in Conditions 4.6.2(a)(ii)(B) and 4.6.2(c)(ii)(B).

## 4.7 Other Boilers

### 1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Boiler No. 1 (23.7 mmBtu/hr)	PM, CO, and SO <sub>2</sub>	1974	N/A	None	None
Boiler No. 2 (23.7 mmBtu/hr)	PM, CO, and SO <sub>2</sub>	1972	N/A	None	None
Boiler No. 3 (23.7 mmBtu/hr)	PM, CO, and SO <sub>2</sub>	1972	N/A	None	None
Boiler No. 4 (23.7 mmBtu/hr)	PM, CO, and SO <sub>2</sub>	1980	N/A	None	None
Boiler No. 5 (23.7 mmBtu/hr)	PM, CO, and SO <sub>2</sub>	1982	N/A	None	None

Note: These units are natural gas or fuel oil fired. Fuel oil is maintained as a back-up fuel only.

### 2. Applicable Requirements

For the emission units in Condition 4.7.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

#### a. i. Opacity Requirements

- A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

#### ii. Compliance Method (Opacity Requirements)

##### Monitoring

- A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on the boilers in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the boiler, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

##### Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- C. Pursuant to Section 39.5(7)(b) of the Act, if required, the Permittee shall keep records for all opacity measurements made in accordance with Method 9.

b. i. **Particulate Matter Requirements (PM)**

A. Pursuant to 35 IAC 212.206, when firing distillate fuel oil, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period to exceed 0.15 kg of particulate matter per MW-hr of actual heat input from any fuel combustion emission unit using liquid fuel exclusively (0.10 lbs/mmBtu).

ii. **Compliance Method (PM Requirements)**

Recordkeeping

A. Pursuant to 39.5(7)(b), the Permittee shall maintain records of PM emissions, when firing fuel oil, in the terms of the applicable standard (lbs/mmBtu) from the boilers on an hourly basis, with supporting calculations.

c. i. **Sulfur Requirements (SO<sub>2</sub>)**

A. Pursuant to 35 IAC 214.122(b), when fuel oil is fired, no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hr), burning liquid fuel exclusively, to exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu).

ii. **Compliance Method (SO<sub>2</sub> Requirements)**

A. Pursuant to 39.5(7)(b), the Permittee shall maintain the following records related to the sulfur content of the fuel fired in the boilers:

I. Records for each shipment of fuel oil received, including the amount received, maximum sulfur content, and supplier. The Permittee may utilize data provided by the fuel oil supplier for the sulfur content of each shipment.

B. Pursuant to 39.5(7)(b), the Permittee shall maintain records of SO<sub>2</sub> emissions in the terms of the applicable standard (lbs/mmBtu) from the affected boilers, with supporting calculations.

d. i. **Carbon Monoxide Requirements (CO)**

A. Pursuant to 35 IAC 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.

ii. **Compliance Method (CO Requirements)**

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of CO emissions from the boilers, including supporting calculations (pounds/hour).

B. The periodic monitoring required by the operational and production requirements in Condition 4.7.2(e) and the work practice requirement in Condition 4.7.2(f) also address monitoring required to meet 39.5(7)(f) of the Act.

e. i. Operational and Production Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, when the boilers are fired using natural gas, only pipeline quality natural gas shall be used.
- B. Pursuant to Section 39.5(7)(a) of the Act, when the boilers are fired using fuel oil, only #2 fuel oil shall be used.

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b), the Permittee shall maintain records of the following:
  - I. The type of fuel fired in the boilers; and
  - II. Records related to the fuel oil fired in the boilers, which show the following for each shipment of fuel oil received; the amount received, maximum sulfur content, and supplier. The Permittee may utilize data provided by the fuel oil supplier for the sulfur content of each shipment.

f. i. Work Practice Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the boilers in a manner consistent with safety and good air pollution control practice for minimizing emissions.
- B. For the purpose of 40 CFR Part 63, Subpart DDDDD, Boilers Nos. 1-5 will meet the following definition, provided by 40 CFR 63.7575, of units designed to burn gas 1 fuels (e.g., natural gas) and be classified as such:

*"Unit designed to burn gas 1 subcategory includes any boiler or process heater that burns only natural gas, refinery gas, and/or other gas 1 fuels. Gaseous fuel boilers and process heaters that burn liquid fuel for periodic testing of liquid fuel, maintenance, or operator training, not to exceed a combined total of 48 hours during any calendar year, are included in this definition. Gaseous fuel boilers and process heaters that burn liquid fuel during periods of gas curtailment or gas supply interruptions of any duration are also included in this definition."*

- I. Pursuant to 40 CFR 63.7515(d) and 40 CFR Part 63, Subpart DDDDD, Table 3, beginning no later than January 31, 2016, the Permittee shall conduct an annual tune-up on each boiler in accordance with 40 CFR 63.7540(a)(10), each annual tune-up specified in 40 CFR 63.7540(a)(10) must be no more than 13 months after the previous tune-up. This tune-up shall consist of the following:
  - 1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
  - 2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;

- 3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);
- 4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject; and
- 5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of the boilers and their associated auxiliary equipment.

Recordkeeping

- B. Pursuant to 40 CFR 63.7540(a)(10)(vi), the Permittee shall maintain on-site and submit, if requested by the IEPA, an annual report containing the following information:
- I. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
  - II. A description of any corrective actions taken as a part of the tune-up; and
  - III. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.
- C. Pursuant to 40 CFR 63.7555(h), the Permittee shall maintain the following records:
- I. You must keep records of the total hours per calendar year that alternative fuel (e.g., fuel not meeting the definition of "gas 1") is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies.
- D. Pursuant to 40 CFR 63.7555(i), the Permittee shall maintain records of the calendar date, time, occurrence and duration of each startup and shutdown.
- E. Pursuant to 40 CFR 63.7555(j), the Permittee shall maintain records of the type(s) and amount(s) of fuels used during each startup and shutdown.
- F. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These



records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

### **3. Non-Applicability Determinations**

- a. Pursuant to 40 CFR 60.40c(a), the boilers 1, 2, 3, 4, and 5 are not subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating, 40 CFR Part 60 Subpart Dc, because the boilers has not been constructed, modified, or reconstructed after June 9, 1989.
- b. The boilers are not subject to 35 IAC 212.322, because the boilers are not by definition process emission units.
- c. The boilers are not subject to 35 IAC 214.301, because the boilers are not by definition process emission units.
- d. The boilers are not subject to 35 IAC 217.141, because the boilers do not have an actual heat input equal to or greater than 250 mmBtu/hr.
- e. The boilers are not subject to the requirements of 35 IAC 218.301 and 302, Use of Organic Material, because, pursuant to 35 IAC 218.303, these regulations shall not apply to fuel combustion emission sources.
- f. The boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.

### **4. Other Requirements**

For the emission units in Condition 4.7.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

#### **a. Operational Flexibility Requirements**

- i. Pursuant to Permit #95090095, the Permittee is authorized to make the following physical or operational change with respect to an affected boiler without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:
  - A. Replacement or upgrading of fuel burners without increase in heat capacity.
  - B. Use of natural gas or fuel oil for fuel, as described in the permit application.
  - C. Upgrades of equipment drives and electrical components.
- ii. Compliance Method (Operational Flexibility)

If the Permittee makes any physical or operational change with respect to the boilers, as noted in Condition 4.7.4(a)(i) above, the Permittee shall maintain records with any supporting calculations to verify that there was no increase in potential emissions of regulated pollutants as a result of the physical or operational change.

## 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.7.2(a)(i), 4.7.2(b)(i), 4.7.2(c)(i), and 4.7.2(d)(i).
  - II. Requirements in Conditions 4.7.4(a)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

## Section 5 - Additional Title I Requirements

This Section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this Section.

## Section 6 - Insignificant Activities Requirements

### 1. Insignificant Activities Subject to Specific Regulations

Pursuant to 35 IAC 201.210 and 201.211, the following activities at the source constitute insignificant activities. Pursuant to Sections 9.1(d) and 39.5(6)(a) of the Act, the insignificant activities are subject to specific standards promulgated pursuant to Sections 111, 112, 165, or 173 of the Clean Air Act. The Permittee shall comply with the following applicable requirements:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Diesel Powered Fire Pumps	2	35 IAC 201.210(a)(15 & 16)
Natural Gas-Fired Emergency Generators	2	35 IAC 201.210(a)(16)

#### a. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements in addition to the applicable requirements in Condition 6.4:

#### i. National Emission Standards for Hazardous Air Pollutants (NESHAP)

- A. Future NESHAP Standards for Emergency Compression Ignition Engines (40 CFR 63 Subpart ZZZZ)

Pursuant to 40 CFR 63.6595(a)(i), no later than May 3, 2013, the source must:

- I. Meet the applicable general provisions of 40 CFR 63 Subpart A. See Condition 7.2(a).
- II. Pursuant to 40 CFR 63.6595(a)(1), the engines must comply with the applicable emission limitations and operating limitations; general compliance requirements; testing and initial compliance requirements; continuous compliance requirements; notifications, reports, and records; and other requirements and information of 40 CFR 63 Subpart ZZZZ.

- B. Future NESHAP Standards for Emergency Spark Ignition Engines (40 CFR 63 Subpart ZZZZ)

Pursuant to 40 CFR 63.6595(a)(i), no later than October 19, 2013, the source must:

- I. Meet the applicable general provisions of 40 CFR 63 Subpart A. See Condition 7.2(a).
- II. Pursuant to 40 CFR 63.6595(a)(1), the engines must comply with the applicable emission limitations and operating limitations; general compliance requirements; testing and initial compliance requirements; continuous compliance requirements; notifications, reports, and records; and other requirements and information of 40 CFR 63 Subpart ZZZZ.

**2. Insignificant Activities in 35 IAC 201.210(a)**

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Starch Application Systems	33	35 IAC 201.210(a)(1) and 201.211
Paster Adhesive Application Areas	8	35 IAC 201.210(a)(1) and 201.211
Platemaking Area Film Cleaning	1	35 IAC 201.210(a)(1) and 201.211
Wastewater Pretreatment System	1	35 IAC 201.210(a)(1) and 201.211
Air Compressors	8	35 IAC 201.210(a)(2) or (a)(3)
Copper Plating Tanks	1	35 IAC 201.210(a)(2) or (a)(3)
Rubber Roller Grinder System	1	35 IAC 201.210(a)(2) or (a)(3)
Sitma Wrapper Sealing Systems	2	35 IAC 201.210(a)(2) or (a)(3)
Shrink Wrap Tunnel Sealing Systems	20	35 IAC 201.210(a)(2) or (a)(3)
Hot Melt Glue Application Systems	10	35 IAC 201.210(a)(2) or (a)(3)
Gravure Polishing	1	35 IAC 201.210(a)(2) or (a)(3)
Parts Cleaning Tanks (That do not use HAPs)	3	35 IAC 201.210(a)(2) or (a)(3)
Water-Based Inkjet Printers	65	35 IAC 201.210(a)(2) or (a)(3)
Acetone-Based Inkjet Printers	10	35 IAC 201.210(a)(2) or (a)(3)
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4).	2	35 IAC 201.210(a)(4)
Gasoline Storage Tank	1	35 IAC 201.210(a)(10)(B)
Storage tanks of virgin or rerefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oil.	3	35 IAC 201.210(a)(11)
Coating operations (excluding powder, architectural, and industrial maintenance coating) with VOM usage < 15 lbs/day from all coating lines (including VOM from coating, dilutents, and cleaning materials).	2	35 IAC 201.210(a)(13)
Any size storage tanks containing exclusively soaps, detergents, surfactants, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions where an organic solvent has not been mixed.	1	35 IAC 201.210(a)(17)

**3. Insignificant Activities in 35 IAC 201.210(b)**

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

**4. Applicable Requirements**

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).

- b. Pursuant to 35 IAC 212.321 or 212.322 (see Conditions 7.2(a) and (b)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.
- c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.
- d. Pursuant to 35 IAC 214.303(a), no person using sulfuric acid shall cause or allow the emission of sulfuric acid and/or sulfur trioxide from all other similar emission sources at a plant or premises to exceed 45.4 grams in any one hour period for sulfuric acid usage less than 1180 Mg/year (100 percent acid basis) (0.10 lbs/hour up to 1300 tons/year)
- e. Pursuant to 35 IAC 215.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.
- f. Pursuant to 35 IAC 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 215.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.
- g. Pursuant to 35 IAC 215.182, for each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, except as provided in 35 IAC 215.181.

## 5. Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).
- b. Potential to emit emission calculations before any air pollution control device for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).

## 6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

### a. Notification 7 Days in Advance

- i. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required.

R.R. Donnelley & Sons Company  
I.D. No.: 029803AAA  
Permit No.: 95090095

Date Received: 9/13/2006  
Date Issued: 7/22/2014

Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):

- A. A description of the emission unit including the function and expected operating schedule of the unit.
  - B. A description of any air pollution control equipment or control measures associated with the emission unit.
  - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
  - D. The means by which emissions were determined or estimated.
  - E. The estimated number of such emission units at the source.
  - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3.
  - iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any addition of an insignificant activity noted above.

**b. Notification Required at Renewal**

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit.

**c. Notification Not Required**

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required.

## Section 7 - Other Requirements

### 1. Testing

- a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
  - i. The name and identification of the emission unit(s) being tested.
  - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
  - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
  - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.
  - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
  - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
  - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
  - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
  - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.7(a) of the Act as follows:
  - i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
  - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.
- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but



no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:

- i. General information including emission unit(s) tested.
  - ii. A summary of results.
  - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
  - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
  - v. Detailed description of test conditions, including:
    - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
    - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
    - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
  - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
  - vii. An explanation of any discrepancies among individual tests or anomalous data.
  - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
  - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
  - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

<b>2. PM Process Weight Rate Requirements</b>
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**a. New Process Emission Units - 35 IAC 212.321**

New Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

Where:

P = Process weight rate (T/hr)  
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54  
B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8  
B = 0.16

iii. Limits for New Process Emission Units [35 IAC 212.321(c)]:

<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>	<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>
0.05	0.55	25.00	14.00
0.10	0.77	30.00	15.60
0.20	1.10	35.00	17.00
0.30	1.35	40.00	18.20
0.40	1.58	45.00	19.20
0.50	1.75	50.00	20.50
0.75	2.40	100.00	29.50
1.00	2.60	150.00	37.00
2.00	3.70	200.00	43.00
3.00	4.60	250.00	48.50
4.00	5.35	300.00	53.00
5.00	6.00	350.00	58.00
10.00	8.70	400.00	62.00
15.00	10.80	450.00	66.00
20.00	12.50	500.00	67.00

**3. 40 CFR 63 Subpart A Requirements (NESHAP)**

**a. 40 CFR 63 Subpart A and Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks**

Pursuant to 40 CFR 63 Subpart A and Subpart N, the Permittee shall comply with the following applicable General Provisions as indicated:

<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
40 CFR 63.1(a) (1)	Yes	General Applicability of the General Provisions	Additional terms defined in § 63.341; when overlap between subparts A and N occurs, subpart N takes precedence.
40 CFR 63.1(a) (2)	Yes	General Applicability of the General Provisions	
40 CFR 63.1(a) (3)	Yes	General Applicability of the General Provisions	
40 CFR 63.1(a) (4)	Yes	General Applicability of the General Provisions	Subpart N clarifies the applicability of each paragraph in subpart A to sources subject to subpart N.
40 CFR 63.1(a) (5)	No	General Applicability of the General Provisions	[Reserved]
40 CFR 63.1(a) (6)	Yes	General Applicability of the General Provisions	
40 CFR 63.1(a) (7)-(9)	No	General Applicability of the General Provisions	[Reserved]
40 CFR 63.1(a) (10)	Yes	General Applicability of the General Provisions	
40 CFR 63.1(a) (11)	Yes	General Applicability of the General Provisions	§ 63.347(a) of subpart N also allows report submissions via fax and on electronic media.
40 CFR 63.1(a) (12)	Yes	General Applicability of the General Provisions	
40 CFR 63.1(b) (1)	No	General Applicability of the General Provisions	§ 63.340 of subpart N specifies applicability.
40 CFR 63.1(b) (2)	No	General Applicability of the General Provisions	[Reserved]
40 CFR 63.1(b) (3)	No	General Applicability of the General Provisions	This provision in subpart A is being deleted. Also, all affected area and major sources are subject to subpart N; there are no exemptions.
40 CFR 63.1(c) (1)	Yes	General Applicability of the General Provisions	Subpart N clarifies the applicability of each paragraph in subpart A to sources subject to subpart N.
40 CFR 63.1(c) (2)	Yes	General Applicability of the General Provisions	§ 63.340(e) of Subpart N exempts area sources from the obligation to obtain Title V operating permits.
40 CFR 63.1(c) (3)-(4)	No	General Applicability of the General Provisions	[Reserved]
40 CFR	No	General Applicability of the General	Subpart N clarifies that an area

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<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
63.1(c) (5)		Provisions	source that becomes a major source is subject to the requirements for major sources.
40 CFR 63.1(e)	Yes	General Applicability of the General Provisions	
40 CFR 63.2	Yes	Definitions	Additional terms defined in § 63.341; when overlap between subparts A and N occurs, subpart N takes precedence.
40 CFR 63.3	Yes	Units and Abbreviations	Other units used in subpart N are defined in that subpart.
40 CFR 63.4(a) (1)-(2)	Yes	Prohibited Activities and Circumvention	
40 CFR 63.4(a) (3)-(5)	No	Prohibited Activities and Circumvention	[Reserved]
40 CFR 63.4(b)-(c)	Yes	Prohibited Activities and Circumvention	
40 CFR 63.5(a)	Yes	Preconstruction Review and Notification Requirements	Except replace the term "source" and "stationary source" in § 63.5(a) (1) and (2) of subpart A with "affected sources."
40 CFR 63.5(b) (1)	Yes	Preconstruction Review and Notification Requirements	
40 CFR 63.5(b) (2)	No	Preconstruction Review and Notification Requirements	[Reserved]
40 CFR 63.5(b) (3)	Yes	Preconstruction Review and Notification Requirements	Applies only to major affected sources.
40 CFR 63.5(b) (4)	No	Preconstruction Review and Notification Requirements	Subpart N (§ 63.345) specifies requirements for the notification of construction or reconstruction for affected sources that are not major.
40 CFR 63.5(b) (5)	No	Preconstruction Review and Notification Requirements	[Reserved]
40 CFR 63.5(b) (6)	Yes	Preconstruction Review and Notification Requirements	
40 CFR 63.5(c)	No	Preconstruction Review and Notification Requirements	[Reserved]
40 CFR 63.5(d) (1) (i)	No	Preconstruction Review and Notification Requirements	§ 63.345(c) (5) of subpart N specifies when the application or notification shall be submitted.
40 CFR 63.5(d) (1) (ii)	Yes	Preconstruction Review and Notification Requirements	Applies to major affected sources that are new or reconstructed.
40 CFR 63.5(d) (1) (iii)	Yes	Preconstruction Review and Notification Requirements	Except information should be submitted with the Notification of Compliance Status required by § 63.347(e) of subpart N.
40 CFR 63.5(d) (2)	Yes	Preconstruction Review and Notification Requirements	Applies to major affected sources that are new or reconstructed except: (1) replace "source" in § 63.5(d) (2) of subpart A with

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<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
			"affected source"; and (2) actual control efficiencies are submitted with the Notification of Compliance Status required by § 63.347(e).
40 CFR 63.5(d)(3)-(4)	Yes	Preconstruction Review and Notification Requirements	Applies to major affected sources that are new or reconstructed.
40 CFR 63.5(e)	Yes	Preconstruction Review and Notification Requirements	Applies to major affected sources that are new or reconstructed.
40 CFR 63.5(f)(1)	Yes	Preconstruction Review and Notification Requirements	Except replace "source" in § 63.5(f)(1) of subpart A with "affected source."
40 CFR 63.5(f)(2)	No	Preconstruction Review and Notification Requirements	New or reconstructed affected sources shall submit the request for approval of construction or reconstruction under § 63.5(f) of subpart A by the deadline specified in § 63.345(c)(5) of subpart N.
40 CFR 63.6(a)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(b)(1)-(2)	Yes	Compliance with Standards and Maintenance Requirements	Except replace "source" in § 63.6(b)(1)-(2) of part A with "affected source."
40 CFR 63.6(b)(3)-(4)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(b)(5)	Yes	Compliance with Standards and Maintenance Requirements	Except replace "source" in § 63.6(b)(5) of subpart A with "affected source."
40 CFR 63.6(b)(7)	No	Compliance with Standards and Maintenance Requirements	Provisions for new area sources that become major sources are contained in § 63.343(a)(4) of subpart N.
40 CFR 63.6(c)(1)-(2)	Yes	Compliance with Standards and Maintenance Requirements	Except replace "source" in § 63.6(c)(1)-(2) of subpart A with "affected source."
40 CFR 63.6(c)(3)-(4)	No	Compliance with Standards and Maintenance Requirements	[Reserved]
40 CFR 63.6(c)(5)	No	Compliance with Standards and Maintenance Requirements	Compliance provisions for existing area sources that become major sources are contained in § 63.343(a)(3) of subpart N.
40 CFR 63.6(d)	No	Compliance with Standards and Maintenance Requirements	[Reserved]
40 CFR 63.6(e)(1)-(3)	No	Compliance with Standards and Maintenance Requirements	§ 63.342(f) of subpart N contains work practice standards (operation and maintenance requirements) that override these provisions.
40 CFR 63.6(f)(1)	No	Compliance with Standards and Maintenance Requirements	§ 63.342(b) of subpart N specifies when the standards apply.
40 CFR 63.6(f)(2)(i)-(ii)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR	No	Compliance with Standards and	§ 63.344(b) of subpart N specifies

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<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
63.6(f)(2)(iii)		Maintenance Requirements	instances in which previous performance test results for existing sources are acceptable.
40 CFR 63.6(f)(2)(iv)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(f)(2)(v)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(f)(3)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(g)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(h)(1)	No	Compliance with Standards and Maintenance Requirements	SSM Exception
40 CFR 63.6(h)(2)	No	Compliance with Standards and Maintenance Requirements	Subpart N does not contain any opacity or visible emission standards.
40 CFR 63.6(i)(1)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(i)(2)	Yes	Compliance with Standards and Maintenance Requirements	Except replace "source" in § 63.6(i)(2)(i) and (ii) of subpart A with "affected source."
40 CFR 63.6(i)(3)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(i)(4)(i)	No	Compliance with Standards and Maintenance Requirements	§ 63.343(a)(6) of subpart N specifies the procedures for obtaining an extension of compliance and the date by which such requests must be submitted.
40 CFR 63.6(i)(4)(ii)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(i)(5)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(i)(6)(i)	Yes	Compliance with Standards and Maintenance Requirements	This paragraph only references "paragraph (i)(4) of this section" for compliance extension provisions. But, § 63.343(a)(6) of subpart N also contains provisions for requesting a compliance extension.
40 CFR 63.6(i)(6)(ii)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(i)(7)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(i)(8)	Yes	Compliance with Standards and Maintenance Requirements	This paragraph only references "paragraphs (i)(4) through (i)(6) of this section" for compliance extension provisions. But, § 63.343(a)(6) of subpart N also contains provisions for requesting a compliance extension.
40 CFR 63.6(i)(9)	Yes	Compliance with Standards and Maintenance Requirements	This paragraph only references "paragraphs (i)(4) through (i)(6) of

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<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
			this section" and "paragraphs (i)(4) and (i)(5) of this section" for compliance extension provisions. But, § 63.343(a)(6) of subpart N also contains provisions for requesting a compliance extension.
40 CFR 63.6(i)(10)(i)-(iv)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(i)(10)(v)(A)	Yes	Compliance with Standards and Maintenance Requirements	This paragraph only references "paragraph (i)(4)" for compliance extension provisions. But, § 63.343(a)(6) of subpart N also contains provisions for requesting a compliance extension.
40 CFR 63.6(i)(10)(v)(B)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(i)(11)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(i)(12)(i)	Yes	Compliance with Standards and Maintenance Requirements	This paragraph only references "paragraph (i)(4)(i) or (i)(5) of this section" for compliance extension provisions. But, § 63.343(a)(6) of subpart N also contains provisions for requesting a compliance extension.
40 CFR 63.6(i)(12)(ii)-(iii)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(i)(13)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(i)(14)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(i)(15)	No	Compliance with Standards and Maintenance Requirements	[Reserved]
40 CFR 63.6(i)(16)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(j)	Yes	Compliance with Standards and Maintenance Requirements	
40 CFR 63.7(a)(1)	Yes	Performance Testing Requirements	
40 CFR 63.7(a)(2)(i)-(viii)	No	Performance Testing Requirements	[Reserved]
40 CFR 63.7(a)(2)(ix)	Yes	Performance Testing Requirements	
40 CFR 63.7(a)(3)	Yes	Performance Testing Requirements	
40 CFR 63.7(a)(4)	Yes	Performance Testing Requirements	

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<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
40 CFR 63.7(b) (1)	No	Performance Testing Requirements	\$ 63.347(d) of subpart N requires notification prior to the performance test. \$ 63.344(a) of subpart N requires submission of a site-specific test plan upon request.
40 CFR 63.7(b) (2)	Yes	Performance Testing Requirements	
40 CFR 63.7(c)	No	Performance Testing Requirements	\$ 63.344(a) of subpart N specifies what the test plan should contain, but does not require test plan approval or performance audit samples.
40 CFR 63.7(d)	Yes	Performance Testing Requirements	Except replace "source" in the first sentence of \$ 63.7(d) of subpart A with "affected source."
40 CFR 63.7(e) (1)	No	Performance Testing Requirements	See \$ 63.344(a). Any cross reference to \$ 63.7(e)(1) in any other general provision incorporated by reference shall be treated as a cross-reference to \$ 63.344(a).
40 CFR 63.7(e) (2)-(4)	Yes	Performance Testing Requirements	Subpart N also contains test methods specific to affected sources covered by that subpart.
40 CFR 63.7(f)	Yes	Performance Testing Requirements	\$ 63.344(c)(2) of subpart N identifies CARB Method 425 as acceptable under certain conditions.
40 CFR 63.7(g) (1)	No	Performance Testing Requirements	Subpart N identifies the items to be reported in the compliance test [\$ 63.344(a)] and the timeframe for submitting the results [\$ 63.347(f)].
40 CFR 63.7(g) (2)	No	Performance Testing Requirements	[Reserved]
40 CFR 63.7(g) (3)	Yes	Performance Testing Requirements	
40 CFR 63.7(h) (1)-(2)	Yes	Performance Testing Requirements	
40 CFR 63.7(h) (3) (i)	Yes	Performance Testing Requirements	This paragraph only references "\$ 63.6(i)" for compliance extension provisions. But, \$ 63.343(a)(6) of subpart N also contains provisions for requesting a compliance extension.
40 CFR 63.7(h) (3) (ii)-(iii)	Yes	Performance Testing Requirements	
40 CFR 63.7(h) (4)-(5)	Yes	Performance Testing Requirements	
40 CFR 63.8(a) (1)	Yes	Monitoring Requirements	
40 CFR 63.8(a) (2)	No	Monitoring Requirements	Work practice standards are contained in \$ 63.342(f) of subpart



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<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
			N.
40 CFR 63.8(a) (3)	No	Monitoring Requirements	[Reserved]
40 CFR 63.8(a) (4)	No	Monitoring Requirements	
40 CFR 63.8(b) (1)	Yes	Monitoring Requirements	
40 CFR 63.8(b) (2)	No	Monitoring Requirements	\$ 63.344(d) of subpart N specifies the monitoring location when there are multiple sources.
40 CFR 63.8(b) (3)	No	Monitoring Requirements	[Reserved]
40 CFR 63.8(c) (1) (i)	No	Monitoring Requirements	Subpart N requires proper maintenance of monitoring devices expected to be used by sources subject to subpart N.
40 CFR 63.8(c) (1) (ii)	No	Monitoring Requirements	\$ 63.342(f) (3) (iv) of subpart N specifies reporting when the O&M plan is not followed.
40 CFR 63.8(c) (1) (iii)	No	Monitoring Requirements	\$ 63.343(f) (2) identifies the criteria for whether O&M procedures are acceptable.
40 CFR 63.8(c) (2) - (3)	No	Monitoring Requirements	\$ 63.344(d) (2) requires appropriate use of monitoring devices.
40 CFR 63.8(c) (4) - (7)	No	Monitoring Requirements	
40 CFR 63.8(d)	No	Monitoring Requirements	Maintenance of monitoring devices is required by §§ 63.342(f) and 63.344(d) (2) of subpart N.
40 CFR 63.8(e)	No	Monitoring Requirements	There are no performance evaluation procedures for the monitoring devices expected to be used to comply with subpart N.
40 CFR 63.8(f) (1)	Yes	Monitoring Requirements	
40 CFR 63.8(f) (2)	No	Monitoring Requirements	Instances in which the Administrator may approve alternatives to the monitoring methods and procedures of subpart N are contained in \$ 63.343(c) (8) of subpart N.
40 CFR 63.8(f) (3)	Yes	Monitoring Requirements	
40 CFR 63.8(f) (4)	Yes	Monitoring Requirements	
40 CFR 63.8(f) (5)	Yes	Monitoring Requirements	
40 CFR 63.8(f) (6)	No	Monitoring Requirements	Subpart N does not require the use of CEM's.
40 CFR 63.8(g)	No	Monitoring Requirements	Monitoring data does not need to be

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<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
			reduced for reporting purposes because subpart N requires measurement once/day.
40 CFR 63.9(a)	Yes	Notification Requirements	
40 CFR 63.9(b) (1) (i) - (ii)	No	Notification Requirements	\$ 63.343(a)(3) of subpart N requires area sources to comply with major source provisions if an increase in HAP emissions causes them to become major sources.
40 CFR 63.9(b) (1) (iii)	No	Notification Requirements	\$ 63.347(c)(2) of subpart N specifies initial notification requirements for new or reconstructed affected sources.
40 CFR 63.9(b) (2)	No	Notification Requirements	\$ 63.347(c)(1) of subpart N specifies the information to be contained in the initial notification.
40 CFR 63.9(b) (3)	No	Notification Requirements	\$ 63.347(c)(2) of subpart N specifies notification requirements for new or reconstructed sources that are not major affected sources.
40 CFR 63.9(b) (4)	No	Notification Requirements	
40 CFR 63.9(b) (5)	No	Notification Requirements	
40 CFR 63.9(c)	Yes	Notification Requirements	This paragraph only references "\$ 63.6(i)(4) through \$ 63.6(i)(6)" for compliance extension provisions. But, \$ 63.343(a)(6) of subpart N also contains provisions for requesting a compliance extension. Subpart N provides a different timeframe for submitting the request than \$ 63.6(i)(4).
40 CFR 63.9(d)	Yes	Notification Requirements	This paragraph only references "the notification dates established in paragraph (g) of this section." But, \$ 63.347 of subpart N also contains notification dates.
40 CFR 63.9(e)	No	Notification Requirements	Notification of performance test is required by \$ 63.347(d) of subpart N.
40 CFR 63.9(f)	No	Notification Requirements	
40 CFR 63.9(g)	No	Notification Requirements	Subpart N does not require a performance evaluation or relative accuracy test for monitoring devices.
40 CFR 63.9(h) (1) - (3)	No	Notification Requirements	\$ 63.347(e) of subpart N specifies information to be contained in the notification of compliance status and the timeframe for submitting this information.
40 CFR	No	Notification Requirements	[Reserved]

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<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
63.9(h) (4)			
40 CFR 63.9(h) (5)	No	Notification Requirements	Similar language has been incorporated into § 63.347(e)(2)(iii) of subpart N.
40 CFR 63.9(h) (6)	Yes	Notification Requirements	
40 CFR 63.9(i)	Yes	Notification Requirements	
40 CFR 63.9(j)	Yes	Notification Requirements	
40 CFR 63.10(a)	Yes	Recordkeeping and Reporting Requirements	
40 CFR 63.10(b) (1)	Yes	Recordkeeping and Reporting Requirements	
40 CFR 63.10(b) (2)	No	Recordkeeping and Reporting Requirements	§ 63.346(b) of subpart N specifies the records that must be maintained.
40 CFR 63.10(b) (3)	No	Recordkeeping and Reporting Requirements	Subpart N applies to major and area sources.
40 CFR 63.10(c)	No	Recordkeeping and Reporting Requirements	Applicable requirements of § 63.10(c) have been incorporated into § 63.346(b) of subpart N.
40 CFR 63.10(d) (1)	Yes	Recordkeeping and Reporting Requirements	
40 CFR 63.10(d) (2)	No	Recordkeeping and Reporting Requirements	§ 63.347(f) of subpart N specifies the timeframe for reporting performance test results.
40 CFR 63.10(d) (3)	No	Recordkeeping and Reporting Requirements	Subpart N does not contain opacity or visible emissions standards.
40 CFR 63.10(d) (4)	Yes	Recordkeeping and Reporting Requirements	
40 CFR 63.10(d) (5)	No	Recordkeeping and Reporting Requirements	§ 63.342(f)(3)(iv) and § 63.347(g)(3) of subpart N specify reporting associated with malfunctions.
40 CFR 63.10(e)	No	Recordkeeping and Reporting Requirements	§ 63.347(g) and (h) of subpart N specify the frequency of periodic reports of monitoring data used to establish compliance. Applicable requirements of § 63.10(e) have been incorporated into § 63.347(g) and (h).
40 CFR 63.10(f)	Yes	Recordkeeping and Reporting Requirements	
40 CFR 63.11	No	Control Device and Work Practice Requirements	Flares will not be used to comply with the emission limits.
40 CFR 63.12- 63.15	Yes	State Authority and Delegations, Addresses of State Air Pollution Control Agencies and EPA Regional Offices, Incorporations by Reference, and Availability of Information and Confidentiality	

**b. 40 CFR 63 Subpart A and Subpart KK - National Emission Standards for the Printing and Publishing Industry**

Pursuant to 40 CFR 63 Subpart A and Subpart KK, the Permittee shall comply with the following applicable General Provisions as indicated:

<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
40 CFR 63.1(a)(1)-(a)(4)	Yes.	General Applicability of the General Provisions	
40 CFR 63.1(a)(5)	No	General Applicability of the General Provisions	Section reserved.
40 CFR 63.1(a)(6)-(a)(8)	No.	General Applicability of the General Provisions	
40 CFR 63.1(a)(9)	No	General Applicability of the General Provisions	Section reserved.
40 CFR 63.1(a)(10)-(a)(14)	Yes.	General Applicability of the General Provisions	
40 CFR 63.1(b)(1)	No	General Applicability of the General Provisions	Subpart KK specifies applicability.
40 CFR 63.1(b)(2)-(b)(3)	Yes.	General Applicability of the General Provisions	
40 CFR 63.1(c)(1)	Yes.	General Applicability of the General Provisions	
40 CFR 63.1(c)(2)	No	General Applicability of the General Provisions	Area sources are not subject to subpart KK.
40 CFR 63.1(c)(3)	No	General Applicability of the General Provisions	Section reserved.
40 CFR 63.1(c)(4)	Yes.	General Applicability of the General Provisions	
40 CFR 63.1(c)(5)	No.	General Applicability of the General Provisions	
40 CFR 63.1(d)	No	General Applicability of the General Provisions	Section reserved.
40 CFR 63.1(e)	Yes.	General Applicability of the General Provisions	
40 CFR 63.2	Yes	Definitions	Additional definitions in subpart KK.
40 CFR 63.3(a)-(c)	Yes.	Units and Abbreviations	
40 CFR 63.4(a)(1)-(a)(3)	Yes.	Prohibited Activities and Circumvention	
40 CFR 63.4(a)(4)	No	Prohibited Activities and Circumvention	Section reserved.
40 CFR 63.4(a)(5)	Yes.	Prohibited Activities and Circumvention	

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<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
40 CFR 63.4(b)-(c)	Yes.	Prohibited Activities and Circumvention	
40 CFR 63.5(a)(1)-(a)(2)	Yes.	Preconstruction Review and Notification Requirements	
40 CFR 63.5(b)(1)	Yes.	Preconstruction Review and Notification Requirements	
40 CFR 63.5(b)(2)	No	Preconstruction Review and Notification Requirements	Section reserved.
40 CFR 63.5(b)(3)-(b)(6)	Yes.	Preconstruction Review and Notification Requirements	
40 CFR 63.5(c)	No	Preconstruction Review and Notification Requirements	Section reserved.
40 CFR 63.5(d)	Yes.	Preconstruction Review and Notification Requirements	
40 CFR 63.5(e)	Yes.	Preconstruction Review and Notification Requirements	
40 CFR 63.5(f)	Yes.	Preconstruction Review and Notification Requirements	
40 CFR 63.6(a)	Yes.	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(b)(1)-(b)(5)	Yes.	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(b)(6)	No	Compliance with Standards and Maintenance Requirements	Section reserved.
40 CFR 63.6(b)(7)	Yes.	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(c)(1)-(c)(2)	Yes.	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(c)(3)-(c)(4)	No	Compliance with Standards and Maintenance Requirements	Sections reserved.
40 CFR 63.6(c)(5)	Yes.	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(d)	No	Compliance with Standards and Maintenance Requirements	Section reserved.
40 CFR 63.6(e)(1)(i)	No	Compliance with Standards and Maintenance Requirements	See 63.823(b) for general duty requirement. Any cross-reference to 63.6(e)(1)(i) in any other general provision incorporated by reference shall be treated as a cross-reference to 63.823(b).
40 CFR 63.6(e)(1)(ii)	No	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(e)(1)(iii)	Yes.	Compliance with Standards and Maintenance Requirements	

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<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
40 CFR 63.6(e) (2)	No	Compliance with Standards and Maintenance Requirements	Section reserved.
40 CFR 63.6(e) (3)	No	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(f) (1)	No	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(f) (2)-(f) (3)	Yes.	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(g)	Yes.	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(h)	No	Compliance with Standards and Maintenance Requirements	Subpart KK does not require COMS.
40 CFR 63.6(i) (1)-(i) (14)	Yes.	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(i) (15)	No	Compliance with Standards and Maintenance Requirements	Section reserved.
40 CFR 63.6(i) (16)	Yes.	Compliance with Standards and Maintenance Requirements	
40 CFR 63.6(j)	Yes.	Compliance with Standards and Maintenance Requirements	
40 CFR 63.7(a)-(d)	Yes.	Performance Testing Requirements	
40 CFR 63.7(e) (1)	No	Performance Testing Requirements	See 63.827 introductory text. Any cross-reference to 63.7(e)(1) in any other general provision incorporated by reference shall be treated as a cross-reference to 63.827 introductory text.
40 CFR 63.7(e) (2)-(e) (4)	Yes.	Performance Testing Requirements	
40 CFR 63.8(a) (1)-(a) (2)	Yes.	Monitoring Requirements	
40 CFR 63.8(a) (3)	No	Monitoring Requirements	Section reserved.
40 CFR 63.8(a) (4)	No	Monitoring Requirements	Subpart KK specifies the use of solvent recovery devices or oxidizers.
40 CFR 63.8(b)	Yes.	Monitoring Requirements	
40 CFR 63.8(c) (1)-(3)	Yes.	Monitoring Requirements	
40 CFR 63.8(c) (4)	No	Monitoring Requirements	Subpart KK specifies CMS sampling requirements.
40 CFR 63.8(c) (5)	No	Monitoring Requirements	Subpart KK does not require COMS.
40 CFR	Yes	Monitoring Requirements	Provisions for COMS are not

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<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
63.8(c)(6)-(c)(8)			applicable.
40 CFR 63.8(d)(1)-(2)	Yes.	Monitoring Requirements	
40 CFR 63.8(d)(3)	Yes, except for last sentence.	Monitoring Requirements	
40 CFR 63.8(e)-(f)	Yes.	Monitoring Requirements	
40 CFR 63.8(g)	No	Monitoring Requirements	Subpart KK specifies CMS data reduction requirements.
40 CFR 63.9(a)	Yes.	Notification Requirements	
40 CFR 63.9(b)(1)	Yes.	Notification Requirements	
40 CFR 63.9(b)(2)	Yes	Notification Requirements	Initial notification submission date extended.
40 CFR 63.9(b)(3)-(b)(5)	Yes.	Notification Requirements	
40 CFR 63.9(c)-(e)	Yes.	Notification Requirements	
40 CFR 63.9(f)	No	Notification Requirements	Subpart KK does not require opacity and visible emissions observations.
40 CFR 63.9(g)	Yes	Notification Requirements	Provisions for COMS are not applicable.
40 CFR 63.9(h)(1)-(h)(3)	Yes.	Notification Requirements	
40 CFR 63.9(h)(4)	No	Notification Requirements	Section reserved.
40 CFR 63.9(h)(5)-(h)(6)	Yes.	Notification Requirements	
40 CFR 63.9(i)	Yes.	Notification Requirements	
40 CFR 63.9(j)	Yes.	Notification Requirements	
40 CFR 63.10(a)	Yes.	Recordkeeping and Reporting Requirements	
40 CFR 63.10(b)(1)	Yes.	Recordkeeping and Reporting Requirements	
40 CFR 63.10(b)(2)(i)	No.	Recordkeeping and Reporting Requirements	
40 CFR 63.10(b)(2)(ii)	No	Recordkeeping and Reporting Requirements	See 63.829(g) for recordkeeping of occurrence and duration of malfunctions. See 63.829(h) for recordkeeping of actions taken during malfunction. Any cross-reference to 63.10(b)(2)(ii) in any other general provision incorporated by reference shall be treated as a cross-reference to 63.829(g).

**Section 7 - Other Requirements**  
**7.3 - 40 CFR 63 Subpart A**  
**Requirements (NESHAP)**

<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
40 CFR 63.10(b) (2) (iii)	Yes.	Recordkeeping and Reporting Requirements	
40 CFR 63.10(b) (2) (iv) - (b) (2) (v)	No.	Recordkeeping and Reporting Requirements	
40 CFR 63.10(b) (2) (vi) - (b) (2) (xiv)	Yes.	Recordkeeping and Reporting Requirements	
40 CFR 63.10(b) (3)	Yes.	Recordkeeping and Reporting Requirements	
40 CFR 63.10(c) (1)	Yes.	Recordkeeping and Reporting Requirements	
40 CFR 63.10(c) (2) - (c) (4)	No	Recordkeeping and Reporting Requirements	Sections reserved.
40 CFR 63.10(c) (5) - (c) (8)	Yes.	Recordkeeping and Reporting Requirements	
40 CFR 63.10(c) (9)	No	Recordkeeping and Reporting Requirements	Section reserved.
40 CFR 63.10(c) (10)	No	Recordkeeping and Reporting Requirements	See 63.830(b) (6) (v) for reporting malfunctions. Any cross-reference to 63.10(c) (10) in any other general provision incorporated by reference shall be treated as a cross- reference to 63.830(b) (6) (v).
40 CFR 63.10(c) (11)	No	Recordkeeping and Reporting Requirements	See 63.830(b) (6) (v) for reporting malfunctions. Any cross-reference to 63.10(c) (11) in any other general provision incorporated by reference shall be treated as a cross- reference to 63.830(b) (6) (v).
40 CFR 63.10(c) (12) - (c) (14)	Yes.	Recordkeeping and Reporting Requirements	
40 CFR 63.10(c) (15)	No.	Recordkeeping and Reporting Requirements	
40 CFR 63.10(d) (1) - (d) (2)	Yes.	Recordkeeping and Reporting Requirements	
40 CFR 63.10(d) (3)	No	Recordkeeping and Reporting Requirements	Subpart KK does not require opacity and visible emissions observations.
40 CFR 63.10(d) (4)	Yes.	Recordkeeping and Reporting Requirements	
40 CFR 63.10(d) (5)	No.	Recordkeeping and Reporting Requirements	
40 CFR 63.10(e)	Yes	Recordkeeping and Reporting Requirements	Provisions for COMS are not applicable.
40 CFR 63.10(f)	Yes.	Recordkeeping and Reporting Requirements	



**Section 7 - Other Requirements**  
**7.3 - 40 CFR 63 Subpart A**  
**Requirements (NESHAP)**

<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
40 CFR 63.11	No	Control Device and Work Practice Requirements	Subpart KK specifies the use of solvent recovery devices or oxidizers.
40 CFR 63.12	Yes.	State Authority and Delegations	
40 CFR 63.13	Yes.	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	
40 CFR 63.14	Yes.	Incorporations by Reference	
40 CFR 63.15	Yes.	Availability of Information and Confidentiality	

**c. 40 CFR 63 Subpart A and Subpart DDDDD - Boilers**

Pursuant to 40 CFR 63 Subpart A and Subpart DDDDD, the Permittee shall comply with the following applicable General Provisions as indicated:

<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
40 CFR 63.1	Yes	General Applicability of the General Provisions	
40 CFR 63.2	Yes	Definitions	Additional terms defined in 40 CFR 63.7575.
40 CFR 63.3	Yes	Units and Abbreviations	
40 CFR 63.4	Yes	Prohibited Activities and Circumvention	
40 CFR 63.5	Yes	Preconstruction Review and Notification Requirements	
40 CFR 63.6	Yes	Compliance with Standards and Maintenance Requirements	With the exception of (e)(1)(i); see 40 CFR 63.7500(a)(3); (e)(1)(ii), (e)(3), (f)(1), and (h)(1); see 40 CFR 63.7500(a).
40 CFR 63.7	Yes	Performance Testing Requirements	With the exception of (e)(1); Subpart DDDDD specifies conditions for conducting performance tests at 40 CFR 63.7520(a).
40 CFR 63.8	Yes	Monitoring Requirements	With the exception of (c)(1)(i); see 40 CFR 63.7500(a)(3); (c)(1)(iii), and the last sentence of (d)(3); which refers to a startup, shutdown, and malfunction plan and startup, shutdown, and malfunction plans are not required.
40 CFR 63.9	Yes	Notification Requirements	
40 CFR 63.10	Yes	Recordkeeping and Reporting Requirements	With the exception of (b)(2)(ii); see § 63.7555(d)(7) for recordkeeping of occurrence and duration and 40 CFR 63.7555(d)(8) for actions taken during malfunctions; (b)(2)(iv) and (v), (b)(3), (c)(10) and (11); see 40 CFR 63.7555(d)(7) for recordkeeping of occurrence and duration and 40 CFR 63.7555(d)(8) for actions taken during malfunctions; (c)(15), (d)(3), and (d)(5); see 40 CFR 63.7550(c)(11) for malfunction reporting requirements.
40 CFR 63.11	No	Control Device and Work Practice Requirements	
40 CFR 63.12	Yes	State Authority and Delegations	
40 CFR 63.13	Yes	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	
40 CFR 63.14	Yes	Incorporations by Reference	
40 CFR 63.15	Yes	Availability of Information and Confidentiality	
40 CFR 63.16	Yes	Performance Track Provisions	

#### 4. Compliance Assurance Monitoring (CAM) Requirements

##### a. CAM Provisions

###### i. Proper Maintenance

Pursuant to 40 CFR 64.7(b), at all times, the source shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

###### ii. Continued Operation

Pursuant to 40 CFR 64.7(c), except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the source shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit (PSEU) is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The source shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

###### iii. Response to Excursions or Exceedances

A. Pursuant to 40 CFR 64.7(d)(1), upon detecting an excursion or exceedance, the source shall restore operation of the PSEU (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

B. Pursuant to 40 CFR 64.7(d)(2), determination of whether the source has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device.

##### b. Monitoring - Monitoring

Pursuant to 40 CFR 64.7(a), the source shall comply with the monitoring requirements of the CAM Plans as described in 7.4(e) below, pursuant to 40 CFR Part 64 as submitted in the source's CAM plan application.

c. **Monitoring - Recordkeeping**

Pursuant to 40 CFR 64.9(b)(1), the source shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information related to the monitoring requirements established for CAM.

d. **Monitoring - Reporting**

Pursuant to Sections 39.5(7)(b) and (f) of the Act, the source shall submit the following reporting requirements:

i. **Semiannual Reporting**

As part of the required Semiannual Monitoring Reports, the source shall submit a CAM report including the following at a minimum:

- A. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(i).
- B. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(ii).

e. **CAM Plans**

The following tables contain the CAM Plans in this CAAPP permit:

Table	Emission Unit Section	PSEU Designation	Pollutant
7.4.1	4.1	Presses MM-715, MM-716, MM-717, MM-718, MM-719, MM-721, MM-722, and MM-723	VOM
7.4.2	4.5	Paper Collection System No.3 (C-3)	PM

**Table 7.4.1 - CAM Plan**

Emission Unit Section:	4.1	
PSEU Designation:	Presses MM-715, MM-716, MM-717, MM-718, MM-719, MM-721, MM-722, and MM-723	
Pollutant:	VOM	
Indicators:	#1) Oxidizer operating temperature	#2) N/A
<b>General Criteria</b>		
The Monitoring Approach Used to Measure the Indicators:	Record the operating temperature of the oxidizers.	
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	3-hour average temperature based on most recent performance test.	
Quality Improvement Plan (QIP) Threshold Levels:	Greater than 5% of the operating hours outside the indicator range during any 6-month period.	
<b>Performance Criteria</b>		
The Specifications for Obtaining Representative Data:	The recording instrument shall be accurate to within 2.0% of temperature measured, or $\pm 20^{\circ}\text{F}$ , whichever is greater.	
Verification Procedures to Confirm the Operational Status of the Monitoring:	Temperatures recorded on electronic media or chart paper.	
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	Calibration check of the recording instrument will be conducted in accordance with OEM recommendations.	
The Monitoring Frequency:	Measured continuously.	
The Data Collection Procedures That Will Be Used:	Automatically recorded on electronic media or chart paper on a continuous basis.	
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	3 hours.	

**Table 7.4.2 - CAM Plan**

Emission Unit Section: 4.5		
PSEU Designation: Paper Collection System No.3 (C-3)		
Pollutant: PM		
Indicators:	#1) Work practice/inspection	#2) Visible emissions observations of baghouse exhaust
<b>General Criteria</b>		
The Monitoring Approach Used to Measure the Indicators:	Conduct internal inspections of the baghouse systems to verify structural integrity.	Observations of the baghouse exhaust for visible emissions.
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Verification that the integrity of the system has not been jeopardized and it operates as designed.	Normal operation is identified as no visible emissions.
Quality Improvement Plan (QIP) Threshold Levels:	N/A	Greater than 5% of operating hours outside the indicator range during any 6-month period.
<b>Performance Criteria</b>		
The Specifications for Obtaining Representative Data:	Inspections will adequately identify problems.	Visual inspection logs will be maintained to ensure that activity is conducted.
Verification Procedures to Confirm the Operational Status of the Monitoring:	Inspection reports.	Records of the observations made will be maintained at the facility.
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	N/A	N/A
The Monitoring Frequency:	Annually	Daily
The Data Collection Procedures That Will Be Used:	Record results of inspections and observations and any maintenance or corrective actions.	Daily visual observation by a member of the EHS and/or facility maintenance department (or their designee).
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	N/A	N/A

## Section 8 - State Only Requirements

### 1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

<i>Pollutant</i>	<i>Tons/Year</i>
Volatile Organic Material (VOM)	2,062.5
Sulfur Dioxide (SO <sub>2</sub> )	90.4
Particulate Matter (PM)	86.7
Nitrogen Oxides (NO <sub>x</sub> )	82.9
HAP, not included in VOM or PM (HAP)	-
Total	2,322.5

### 2. VOM State Only Requirements

- a. The lithographic offset presses, as listed in Condition 4.1.1, shall comply with the following:
  - i. Pursuant to 35 IAC 215.408(b), no owner or operator of a heatset web offset lithographic printing facility, emitting over 100 tons/year of organic material, in the absence of pollution control equipment, may cause or allow the operation of a heatset web offset press unless the fountain solution contains no more than eight (8) percent, by weight, of volatile organic material.
  - ii. Compliance Method (VOM Requirements)

#### Monitoring

- A. Pursuant to 35 IAC 215.409, testing for VOM content of coatings and solvents shall be performed as follows:
  - I. Upon request by the IEPA, the VOM content of the fountain solution "as applied" shall be determined by Method 24 of 40 CFR 60, Appendix A.
  - II. Upon request by the IEPA, the VOM content of cleaning solvents shall be determined by Method 24 and Method 24A of 40 CFR 60, Appendix A.
  - III. This testing may be performed by the supplier of a material provided that the supplier provides documentation for such testing, which demonstrates that the testing was done in accordance with Method 24 and/or Method 24A of 40 CFR 60, Appendix A, to the Permittee and the Permittee's records directly reflect the application of such material and separately account for any additions of solvent.

#### Recordkeeping

Sufficient recordkeeping requirements are provided by Condition 4.1.2(d)(ii)(B).

- b. The rotogravure presses, as listed in Condition 4.2.1, shall comply with the following:
- i. A. Pursuant to 35 IAC 215.401(c)(1), no owner or operator of a publication rotogravure press employing solvent-containing ink may cause or allow the operation of such press unless the owner Permittee installs and operates a carbon adsorption system which reduces the volatile organic emissions from the capture system by at least 90 percent by weight.
  - B. Pursuant to 35 IAC 215.401(d)(1), no owner or operator of a publication rotogravure press which uses a capture system in conjunction with a carbon absorption system may cause or allow the operation of such press unless the design and operation of the capture system is consistent with good engineering practice and the system provides, in combination with the control equipment, an overall reduction in volatile organic material emissions of at least 75 percent.
  - ii. Compliance Method (VOM Requirements)  
  
Sufficient periodic monitoring is provided in the requirements in Section 4.2.2(d)(ii).



## Attachment 1 - List of Emission Units at This Source

Section	Emission Units	Description
4.1	Heatset, Web Offset Lithographic Printing Lines	<p>The lithographic printing process is used to produce magazines, catalogs, books, newspapers, and other printed materials. The Permittee operates nine heatset web offset lithographic printing presses. These offset presses are "heatset web offset". Heatset means that the solvent in the ink is evaporated by a heated dryer, in these presses by gas-fired dryers. The word web means that the paper being printed is a long roll that from which the paper web is unwound, printed on and dried prior to being cut and folded. The dryer exhaust gases from presses are directed through a tandem thermal oxidizer air pollution control system.</p> <p>The oxidizer control system consists of two oxidizers in parallel. Both oxidizers are a type called a regenerative thermal oxidizer (RTO). There is one common duct system and only one of the oxidizers need be operating if the air flow from the operating press dryers does not exceed the capacity of the operating oxidizer. The entire system is computer controlled to determine whether one or two oxidizers need be operating.</p> <p>Emissions such as volatile organic material (VOM) and hazardous air pollutants (HAPs) may result from the use of printing-related materials such as inks, fountain solution additives, and cleaning solvents. Natural gas or propane is the fuel used in the press dryers and the tandem thermal oxidizer system. Emissions of CO, NOx, particulate matter (PM), SO2, and VOM may result from the combustion of this fuel.</p>
4.2	Rotogravure Printing Presses and Storage Tanks	<p>The facility operates seven rotogravure presses, which are used to print high quality magazines and other similar printed material. The Permittee uses a carbon adsorption system to recover the solvent it uses. The solvent is composed primarily of toluene, which is a HAP. These presses and all other emission units in this section (e.g., cylinder preparation and ink storage tanks) are part of the affected source subject to a NESHAP for publication rotogravure printing.</p> <p>There are a number of carbon beds in the control system but they are all considered one system. In a carbon bed system some beds are actively adsorbing the solvent, while others are "offline", either idle or being regenerated by having the solvent removed from the carbon. The Permittee uses steam for regeneration. The steam and solvent are condensed together and separated (decanted) to recover the solvent for reuse. Gravure inks and solvent are stored in a tank farm consisting of 16 storage tanks ranging in size from 8,000 to 25,000 gallons.</p>

**Attachment 1 - List of Emission Units at This Source**

<i>Section</i>	<i>Emission Units</i>	<i>Description</i>
4.3	Rotogravure Cylinder Manufacturing	The facility operates a number of pieces of equipment designed to clean the cylinders used on the rotogravure presses. Solvent cleaning operations use the same solvents as employed in the rotogravure printing. These operations are part of the affected source subject to a NESHAP for publication rotogravure printing.
4.4	Hard Chrome Plating Operation	<p>The facility operates two hard chrome plating tanks, which are used to provide a protective/hard coating of chrome onto the surface of the engraved copper roto cylinders to reduce wear during use. The chrome plating tanks are equipped with mist control devices for the reduction of chromic acid emissions.</p> <p>Chromium, a hazardous air pollutant, is emitted from the cylinder chrome plating operation. The tanks are subject to the NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.</p>
4.5	Paper Handling System	The Permittee operates pneumatic paper collection systems for the collection, transport and recycling and reuse of paper trimmings. The paper trimmings are generated in the pressrooms and binderies, pneumatically conveyed to the by-products area, separated from the carrier air stream by cyclone mechanical separators, and baled for shipment to a recycler. Entrained dust in the air discharge from one of the cyclones is removed by a baghouse fabric filtration unit.
4.6 & 4.7	NSPS Boiler and Other Boilers	The Permittee operates boilers that utilize natural gas, propane or fuel oil to generate heat and process steam. Natural gas is the principal fuel utilized by all of the boilers. Propane is available as an alternate stand-by fuel in the event the natural gas supply is interrupted. Emissions of CO, NO <sub>x</sub> , PM, SO <sub>2</sub> and VOM are the result combustion of fuels in the boilers.

## Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
BTU	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EAF	Electric arc furnace
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Greenhouse gas
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
HP	Horsepower
hr	Hour
H <sub>2</sub> S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
KW	Kilowatts
LAER	Lowest Achievable Emission Rate

lb	Pound
m	Meter
MACT	Maximum Achievable Control Technology
mm	Million
mon	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

## Attachment 3 - Contact and Reporting Addresses

<p>IEPA Compliance Section</p> <p>IEPA Stack Test Specialist</p> <p>IEPA Air Quality Planning Section</p> <p>IEPA Air Regional Field Operations Regional Office #3</p> <p>IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Compliance &amp; Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p>
	<p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, IL 60016</p> <p>Phone No.: 847/294-4000</p>
	<p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p>
	<p>Illinois EPA, Bureau of Air Regional Office #3 2009 Mall Street Collinsville, IL 62234</p> <p>Phone No.: 618/346-5120</p>
	<p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, IL 62794-9506</p> <p>Phone No.: 217/785-1705</p>
<p>USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, IL 60604</p> <p>Phone No.: 312/353-2000</p>

**Attachment 4 - Example Certification by a Responsible Official**

<b>SIGNATURE BLOCK</b>	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))	
AUTHORIZED SIGNATURE:	
BY: _____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

R.R. Donnelley & Sons Company  
I.D. No.: 029803AAA  
Permit No.: 95090095

Date Received: 9/13/2006  
Date Issued: 7/22/2014